# 

	ent of the Treasury Revenue Service		,		the IRS. Keep 10	-		"	
Name o				30 to www.irs.gov/i	-orm88/91E for tr	e latest information	EIN or S	SN	
TOMA S		mnghir	o Ch	aritable F	oundation			60056	: 25
Name a	and title of officer or pe			Richard Ob			02	00030	123
Manno	ind title or officer or pe	13011 300,001 0		President	C.L				
Parl	Type of	Return ar		urn Information					
						applicable amount, i	f any from the re-	turn Forr	m 8038-CP and
Form 8 or <b>10a</b> which	5330 filers may ente below, and the am	r dollars and ount on that	l cents. I line for t	For all other forms, e the return being filed	nter whole dollars of with this form was	only. If you check the blank, then leave lin- hen enter -0- on the a	box on line <b>1a, 2</b> e <b>1b, 2b, 3b, 4b,</b> \$	la, 3a, 4a 5b, 6b, 7t	i, 5a, 6a, 7a, 8a, 9a b, 8b, 9b, or 10b,
1a	Form 990 check h	nere		b Total revenue, i	f any (Form 990, Pa	art VIII, column (A), Iir	ne 12)	1b	
<b>2</b> a	Form 990-EZ che	ck here		b Total revenue, i	f any (Form 990-EZ	, line 9)		2b	
3a	Form 1120-POL			<b>b</b> Total tax (Form	1120-POL, line 22)	*******************************			
4a	Form 990-PF che	ck here				(Form 990-PF, Part \			
5a	Form 8868 check	here		b Balance due (Fo	orm 8868, line 3c)		*************************		
6a	Form 990-T chec	k here	X	<b>b</b> Total tax (Form	990-T, Part III, line	4)		6b	203,095.
7a	Form 4720 check	here		b Total tax (Form	4720, Part III, line 1	),,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		7b	
8a	Form 5227 check	here		b FMV of assets a	at end of tax year (	Form 5227, Item D)	(Terra construction of the	8b	
<b>9</b> a	Form 5330 check	here				()			
10a	Form 8038-CP ch			b Amount of cred	it payment reques	sted (Form 8038-CP,	Part III, line 22)		
Part						Person Subject			
Under	penalties of perjury	I declare the	at X	l am an officer of the	above entity or L	I am a person sub	ject to tax with re	spect to	(name
of entir	(y) 16,26		26	~	, (EIN	)	and that I ha	ve exami	ned a copy of the
payme person PIN: cl	nt of taxes to receive	e confidentia iber (PIN) as	al inform my sigr	ation necessary to a nature for the electro	inswer inquiries and	financial institutions d resolve issues relat oplicable, the conser	ed to the paymer t to electronic fur	nt. I have nds withd	selected a
	authorize <u>bu</u>	VCI NO	WILL		т пате		to enter my		er five numbers, but
				ENU III	m name				not enter all zeros
	with a state ager on the return's of As an officer or preturn, if I have it	ncy(ies) regu isclosure co person subje ndicated with	lating che nsent so ct to tax hin this	narities as part of the creen. with respect to the	e IRS Fed/State pro entity, I will enter n the return is being	cated within this return the category of all also authorized by PIN as my signature filed with a state agents sorrows.	e the aforemention re on the tax year	oned ERO	to enter my PIN ectronically filed
	·	,	OTTEST III	y i ii v oi i tilo rotaii i	3 4130103410 0011301	11 30100111		. 1	1/15/04
Part	of officer or person subject	tion and	Author	ntication			Da	ate 1	1/15/24
111111111111111111111111111111111111111									
	<b>EFIN/PIN.</b> Enter yo r (EFIN) followed by	-		_		0123055 Do not enter a			
submit Busine		cordance wi	th the re			ectronically filed retur e-File (MeF) Informati Date		l IRS e-file	
			E	PO Must Potoin	This Form	ee Instructions			
		Do M				ess Requested	To Do So		
For Pri	vacy Act and Pane			ct Notice, see instru		caa nequesteu	10 00 30	Form	<b>8879-TE</b> (2023)

LHA 302521 01-05-24

Form	OMB No. 1545-0047					
			Exempt Organization Business Income Tax Retur (and proxy tax under section 6033(e))		2022	
		For ca	endar year 2023 or other tax year beginning , and ending		2023	
Departm Internal I	nent of the Treasury Revenue Service		Go to www.irs.gov/Form990T for instructions and the latest information.  On not enter SSN numbers on this form as it may be made public if your organization is a 501(c)(3)	.	Open to Public Inspection for 501(c)(3) Organizations Only	
A	Check box if address changed.		Name of organization ( Check box if name changed and see instructions.)	<b>D</b> Emp	oloyer identification number	
<b>B</b> Exe	mpt under section	Print	New Hampshire Charitable Foundation	02-6005625		
X	501(c)(3)	or	Number, street, and room or suite no. If a P.O. box, see instructions.		up exemption number e instructions)	
	408(e) 220(e)	Туре	37 Pleasant Street	`	,	
	408A530(a)		City or town, state or province, country, and ZIP or foreign postal code			
	529(a)529A		Concord, NH 03301-4005	_ F └	Check box if	
		•	ok value of all assets at end of year		an amended return.	
<b>G</b> Ch	neck organization	type	X 501(c) corporation 501(c) trust 401(a) trust Other trust 6417(d)(1)(A) Applicable entity	State	college/university	
H C	neck if filing only to	o claim	Credit from Form 8941 Refund shown on Form 2439 Elective payments	ent amo	ount from Form 3800	
I Ch	neck if a 501(c)(3)	organiz	ation filing a consolidated return with a 501(c)(2) titleholding corporation			
<b>J</b> Er	nter the number of	attach	ed Schedules A (Form 990-T)		2	
			e corporation a subsidiary in an affiliated group or a parent-subsidiary controlled group?		Yes X No	
			d identifying number of the parent corporation	/ 600	\ 00F 6644	
			,	(603	) 225-6641	
Part			d Business Taxable Income		000 470	
1			ess taxable income computed from all unrelated trades or businesses (see instructions)	1	989,478.	
2				2	989,478.	
3	Add lines 1 and 2	<u>'</u> 	(see instructions for limitation rules) Stmt 1 Stmt 2	3	98,848.	
4 5			s taxable income before net operating losses. Subtract line 4 from line 3	<u> </u>	890,630.	
6			ting loss. See instructions		050,050.	
7			ess taxable income before specific deduction and section 199A deduction.	"		
•	Subtract line 6 from		·	7	890,630.	
8			erally \$1,000, but see instructions for exceptions)	_	1,000.	
9			eduction. See instructions			
10			ines 8 and 9		1,000.	
11	Unrelated busin	ess tax	rable income. Subtract line 10 from line 7. If line 10 is greater than line 7, enter zero	11	889,630.	
Part	II Tax Com	putat	ion			
1	Organizations ta	axable	as corporations. Multiply Part I, line 11 by 21% (0.21)	1	186,822.	
2			rates. See instructions for tax computation. Income tax on the amount on			
	Part I, line 11, fro	m:	Tax rate schedule or Schedule D (Form 1041)	2		
3	Proxy tax. See in	nstructi	ons	3		
4			instructions		46.000	
5	Alternative minim	ium tax		5	16,273.	
6			acility income. See instructions		202 005	
7 Parl	Total. Add lines 3		gh 6 to line 1 or 2, whichever applies nents	7	203,095.	
1a	Foreign tax credi	t (corpo	orations attach Form 1118; trusts attach Form 1116) 1a			
b	Other credits (see	e instru	ctions) 1b			
С			Attach Form 3800 (see instructions) 1c	_		
d	Credit for prior-ye	ear mini	mum tax (attach Form 8801 or 8827) 1d	_		
е	Total credits. Ac			1e	202 005	
2			rt II, line 7	2	203,095.	
3a	Amount due from		2014	_		
b	Amount due from			_		
C	Amount due from		21			
d	Amount due from					
e f	Other amounts d	•		3f	0.	
f 4	Total tay Add in	nes 2 a	lines 3a through 3e	31	<del> </del>	
7			x amount here	4	203,095.	
5			lity paid from Form 965-A, Part II, column (k)		0.	

	90-1 (2023)		Page 2
Part	III Tax and Payments (continued)		
6 a	Payments: Preceding year's overpayment credited to the current year	6a 237,003.	
b	Current year's estimated tax payments. Check if section 643(g) election		
	applies	6b	
С	Tax deposited with Form 8868	6c 280,000.	
d	Foreign organizations: Tax paid or withheld at source (see instructions)	6d	
е	Backup withholding (see instructions)	6e	
f	Credit for small employer health insurance premiums (attach Form 8941)	6f	1811
g	Elective payment election amount from Form 3800		
h	Payment from Form 2439	6h	
i	Credit from Form 4136	6i	
i	Other (see instructions)	6j	
7	Total payments. Add lines 6a through 6j		7 517,003.
8			8
9	<b>Tax due.</b> If line 7 is smaller than the total of lines 4, 5, and 8, enter amount owed		9
10	<b>Overpayment.</b> If line 7 is larger than the total of lines 4, 5, and 8, enter amount over		10 313,908.
11	Enter the amount of line 10 you want: Credited to 2024 estimated tax	313,908. Refunded	11 0.
Part			
1	At any time during the 2023 calendar year, did the organization have an interest in		Yes No
÷	over a financial account (bank, securities, or other) in a foreign country? If "Yes,"		162 140
	FinCEN Form 114, Report of Foreign Bank and Financial Accounts, If "Yes," enter	-	1931
	10	r the name of the foreign country	X
2	here		
2			X
	foreign trust?  If "Yes," see instructions for other forms the organization may have to file.		A
3	Enter the amount of tax-exempt interest received or accrued during the tax year	ф	
4			
4		ot include any post-2017 NOL car	
_	shown on Schedule A (Form 990-T). Don't reduce the NOL carryover shown here		
5	Post-2017 NOL carryovers. Enter the Business Activity Code and available post-2		
	the amounts shown below by any NOL claimed on any Schedule A, Part II, line 17		
	Business Activity Code 520000	Available post-2017 NOL	
	520000	+	53,353.
		\$	
		\$	
		\$	
	Reserved for future use		
	Reserved for future use		
Part			
<sup>2</sup> rovide	any additional information. See instructions		
	Under penalties of perjury, I declare that I have examined this return, including accompanying schedules	and atalamenta, and to the best of my know	dedge and heliaf it is true
Sign	correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which	preparer has any knowledge.	reage and belief, it is true,
Here	1/2/ ///	Ma	y the IRS discuss this return with
1010	Signature of officer Date Presi		preparer shown below (see
			tructions)? X Yes No
	Print/Type preparer's name Preparer's signature	Date Check if	PTIN
Paid	(10 miles) -	self-employed	D00005540
Prepa		10/31/24	P02285543
Jse O	nly Firm's name Baker Newman & Noyes	Firm's EIN	01-0494526
	P.O. Box 507	a	2071070 0100
	Firm's address Portland, ME 04112	Phone no. ( )	207)879-2100
			Form <b>990-T</b> (2023)

323711 11-20-23

Form 990-T	Contributions	Statement	1
Description/Kind of Property	Method Used to Determine FMV	Amount	
Various Public Charities	N/A	54,142,7	49.
Total to Form 990-T, Part I, 1	ine 4	54,142,7	49.

Form 990-T	Contr	ibutions Summary		Statement	2
	Contributions Subject Contributions Subject				
For Tax For Tax For Tax For Tax	of Prior Years Unused Year 2018 Year 2019 Year 2020 Year 2021 Year 2022	Contributions 34,490,909 36,691,336 44,140,268 55,849,588 49,613,589			
Total Carı Total Curı	ryover rent Year 10% Contribu	tions	220,785,690 54,142,749		
	cributions Available ncome Limitation as Ad	justed	274,928,439 98,848		
Excess 100	ntributions )% Contributions ess Contributions		274,829,591 0 274,829,591		
Allowable	Contributions Deducti	on		98,8	848
Total Cont	cribution Deduction			98,8	348

### SCHEDULE A (Form 990-T)

### **Unrelated Business Taxable Income From an Unrelated Trade or Business**

OMB No. 1545-0047

2023

Department of the Treasury Internal Revenue Service

Go to www.irs.gov/Form990T for instructions and the latest information.

Do not enter SSN numbers on this form as it may be made public if your organization is a 501(c)(3).

Open to Public Inspection for 501(c)(3) Organizations Only

							JO 1(C)(3) Organizations Only
A 1	Name of the organization New Hampshire Charitable Foundat	ion		E	8 Employer 02-60		cation number 25
<u>c</u> .	Unrelated business activity code (see instructions) 54000	0		[	Sequenc	e: .	1 of 2
<u>E (</u>	Describe the unrelated trade or business UBI from gra	nt a	administra	tion			
Pa	rt I Unrelated Trade or Business Income		(A) Income	(	B) Expense	es	(C) Net
1a	Gross receipts or sales 45,907.						
	Less returns and allowances c Balance	1c	45,90	7.			
2	Cost of goods sold (Part III, line 8)	2	-				
3	Gross profit. Subtract line 2 from line 1c	3	45,90	7.			45,907.
4 a	Capital gain net income (attach Schedule D (Form 1041 or Form						
	1120)). See instructions	4a					
b	Net gain (loss) (Form 4797) (attach Form 4797). See instructions)	4b					
	Capital loss deduction for trusts	4c					
5	Income (loss) from a partnership or an S corporation (attach						
	statement)	5					
6	Rent income (Part IV)	6					
7	Unrelated debt-financed income (Part V)	7					
8	Interest, annuities, royalties, and rents from a controlled						
	organization (Part VI)	8					
9	Investment income of section 501(c)(7), (9), or (17)						
	organizations (Part VII)	9					
10	Exploited exempt activity income (Part VIII)	10					
11	Advertising income (Part IX)	11					
12	Other income (see instructions; attach statement)	12					
13	Total. Combine lines 3 through 12	13	45,90	7.			45,907.
Pa	rt II Deductions Not Taken Elsewhere. See instruct	ions f	or limitations or	n deduct	ions. Ded	duction	ns must be
	directly connected with the unrelated business in						
1	Compensation of officers, directors, and trustees (Part X)					1	
2	Salaries and wages						
3	Repairs and maintenance						
4	Bad debts						
5	Interest (attach statement). See instructions						
6	Taxes and licenses					6	37.
7	Depreciation (attach Form 4562). See instructions						
8	Less depreciation claimed in Part III and elsewhere on return					8b	
9	Depletion					9	
10	Contributions to deferred compensation plans					10	
11	Employee benefit programs					11	
12	Excess exempt expenses (Part VIII)					12	
13	Excess readership costs (Part IX)					13	
14	Other deductions (attach statement)		See St	ateme	nt 3	14	19,063.
15	Total deductions. Add lines 1 through 14					15	19,100.
16	Unrelated business income before net operating loss deduction. S						<u> </u>
	column (C)					16	26,807.
17	Deduction for net operating loss. See instructions					17	0.
18	Unrelated business taxable income. Subtract line 17 from line 10					18	26,807.

For Paperwork Reduction Act Notice, see instructions.

Schedule A (Form 990-T) 2023

	ule A (Form 990-1) 2023					Page 2
Part		nod of inventory valua		Т.	1	
1	Inventory at beginning of year				<del>-  </del>	
2	Purchases				<del>-  </del>	
3	Cost of labor			3	_	
4	Additional section 263A costs (attach statement)					
5	Other costs (attach statement)					
6	Total. Add lines 1 through 5					
7	Inventory at end of year		_	۱ ۵		
8	Cost of goods sold. Subtract line 7 from line 6. Enter					No
9 Part	IV Rent Income (From Real Property and					
1	Description of property (property street address, city, s				')	
'	A	state, ZIP Code). Gried	k ii a dual-use. See iiis	iructions.		
	В					
	c $\square$					
	D					
		Α	В	С	D	
2	Rent received or accrued					
a	From personal property (if the percentage of					
а	rent for personal property is more than 10%					
	but not more than 50%)					
b	From real and personal property (if the					
b	percentage of rent for personal property exceeds					
	50% or if the rent is based on profit or income)					
С	Total rents received or accrued by property.					
·	Add lines 2a and 2b, columns A through D					
3 4	Total rents received or accrued. Add line 2c, columns and Deductions directly connected with the income in lines 2a and 2b (attach statement)		, ,			
5	Total deductions. Add line 4, columns A through D. E	nter here and on Part	I, line 6, column (B)			0.
Part	V Unrelated Debt-Financed Income (se	ee instructions)				
1	Description of debt-financed property (street address,	city, state, ZIP code).	Check if a dual-use. Se	e instructions.		
	A					
	В					
	c					
	D		1			
		Α	В	С	D	
2	Gross income from or allocable to debt-financed					
	property					
3	Deductions directly connected with or allocable					
	to debt-financed property					
a	Straight line depreciation (attach statement)					
b	Other deductions (attach statement)					
С	Total deductions (add lines 3a and 3b,					
	columns A through D)					
4	Amount of average acquisition debt on or allocable					
_	to debt-financed property (attach statement)					
5	Average adjusted basis of or allocable to debt-					
	financed property (attach statement)					
6	Divide line 4 by line 5	%	%		%	<u>%</u>
7	Gross income reportable. Multiply line 2 by line 6					0.
8	Total gross income (add line 7, columns A through D)	. ∟nter nere and on Pa	aπ I, line /, column (A)			0.
0	Allocable deductions Multiply line Calby line C					
9	Allocable deductions. Multiply line 3c by line 6 <b>Total allocable deductions.</b> Add line 9, columns A thr	ough D. Enter here en	d on Part Llina 7 call	mp (P)		0.
10	Total dividends-received deductions included in line					0.

Part	art VI Interest, Annuities, Royalties, and Rents From Controlled Organizations (see instructions)											
		-				E	xempt Contro	lled Orgar	nization	S		
	Name of controller organization	d	2. Employer identification number			al of specified ments made that is included controlling org tion's gross in		cluded i ng orga	in the niza-	Deductions directly connected with income in column 5		
(1)												
(2)	2)											
(3)												
(4)												
					Controlled Or				_ 1			
7	. Taxable Income	ir	Net unrelated acome (loss) e instructions)	1	otal of specif yments mad		that is included in the controlling organization's gross income		:he	11. Deductions directly connected with income in column 10		
(1)												
(2)												
(3)												
(4)												
							Enter here	and on Part I, Ente		Enter	Add columns 6 and 11. Enter here and on Part I, line 8, column (B).	
Totals									0.		0.	
Part	VII Investment	Income	of a Section 50	)1(c)(7),	(9), or (17)	Orga	nization (s	ee instruc	ctions)			
	<b>1.</b> Desc	cription of	income		2. Amoui incom		3. Deduction directly connected (attach states	ected (at	4. Set-a	asides atement	5. Total deductions and set-asides (add cols 3 and 4)	
(1)												
(2)												
(3)												
(4)												
Totals					Add amou column 2. here and or line 9, colu	Enter n Part I,					Add amounts in column 5. Enter here and on Part I, line 9, column (B).	
Part	VIII Exploited E	xempt A	Activity Income	. Other	Than Adv	ertisir	na Income (	see instri	ıctions)		-	
1	Description of exploite			,			<u> </u>					
2	Gross unrelated busin	-		iness. Ente	er here and o	n Part I	, line 10, colum	nn (A)		2		
3	Expenses directly con											
	line 10, column (B)									3		
4	Net income (loss) from								Ī			
	lines 5 through 7									4		
5	Gross income from ac	tivity that	is not unrelated bus	iness inco	me					5		
6	Expenses attributable									6		
7	Excess exempt expen			•								
	4. Enter here and on F	Part II, line	12							7		

Schedule A (Form 990-T) 2023

Part	IX A	dvertising Income					
1	Name(s)	of periodical(s). Check box if reporting	ng two or	more periodicals on a	consolidated bas	sis.	
	Α 🗌						
	в						
	c $\square$						
	D .						
Entor		or each periodical listed above in the	corrocpo	nding column			
Litter	amounts it	or each periodical listed above in the			В	С	D
•	0	de conditation de la compa	ŀ	Α	<u> </u>		<u> </u>
2		dvertising income	-		<u> </u>		0.
	Add coll	umns A through D. Enter here and on	n Part I, lin	e 11, column (A)			<u></u>
а			ı		1		<u> </u>
3		dvertising costs by periodical					
а	Add colu	ımns A through D. Enter here and or	Part I, lin	e 11, column (B)			0.
			ı				
4	Advertisi	ing gain (loss). Subtract line 3 from li	ne				
	2. For an	ny column in line 4 showing a gain,					
	complete	e lines 5 through 8. For any column i	n				
	line 4 sh	owing a loss or zero, do not complet	e				
	lines 5 th	nrough 7, and enter -0- on line 8					
5	Readers	hip costs					
6	Circulation	on income					
7		eadership costs. If line 6 is less than					
	line 5, su	ubtract line 6 from line 5. If line 5 is le	ss				
		6, enter -0-					
8		readership costs allowed as a					
		on. For each column showing a gain o	on				
		nter the lesser of line 4 or line 7					
а		8, columns A through D. Enter the g		he line 8a columns to	tal or -0- here and	on	
-		ne 13					0.
Part	X C	ompensation of Officers, Di	rectors	and Trustees	ee instructions)		
		•		, (-		3. Percentage	4. Compensation
		1. Name		2. Title		of time devoted	attributable to
				21 1100		to business	unrelated business
(1)						%	diffoliated Edelifole
(2)						%	
(3)						%	
(4)						%	
<del>(+)</del>						70	
Total	l Entor hor	re and on Part II, line 1					0.
Part		upplemental Information (se		! <b>\</b>			<u></u>
Part	AI SI		e instruct	ions)			

Form 990-T (A)	Other Deductions	Statement	3
Description		Amount	
Allocated Overhead		19,00	63.
Total to Schedule A, Part	: II, line 14	19,00	63.

### SCHEDULE A (Form 990-T)

### **Unrelated Business Taxable Income From an Unrelated Trade or Business**

OMB No. 1545-0047

2023

Department of the Treasury Internal Revenue Service Go to www.irs.gov/Form990T for instructions and the latest information.

Do not enter SSN numbers on this form as it may be made public if your organization is a 501(c)(3).

Open to Public Inspection for 501(c)(3) Organizations Only

A	Name of the organization  New Hampshire Charitable Foundat		er identific	ation number 25		
С	Unrelated business activity code (see instructions) 52000	0		<b>D</b> Sequen	ce: 2	2 <sub>of</sub> 2
E	Describe the unrelated trade or business Section 512(	a)(	6) Qualified	Partner	ships	5
	rt I Unrelated Trade or Business Income		(A) Income	(B) Expens		(C) Net
	Gross receipts or sales					
	Less returns and allowances c Balance	1c				
2	Cost of goods sold (Part III, line 8)	2				
3	Gross profit. Subtract line 2 from line 1c	3				
	Capital gain net income (attach Schedule D (Form 1041 or Form	<u> </u>				
	1120)). See instructions	4a				
b	Net gain (loss) (Form 4797) (attach Form 4797). See instructions)	4b				
	Capital loss deduction for trusts	4c				
5	Income (loss) from a partnership or an S corporation (attach					
	statement) Statement 4	5	1,425,154.			1,425,154.
6	Rent income (Part IV)	6				
7	Unrelated debt-financed income (Part V)	7				
8	Interest, annuities, royalties, and rents from a controlled					
	organization (Part VI)	8				
9	Investment income of section 501(c)(7), (9), or (17)					
	organizations (Part VII)	9				
10	Exploited exempt activity income (Part VIII)	10				
11	Advertising income (Part IX)	11				
12	Other income (see instructions; attach statement)	12	105 454			4 405 454
<u>13</u>	Total. Combine lines 3 through 12	13	1,425,154.			1,425,154.
Pa	<b>Tt II</b> Deductions Not Taken Elsewhere. See instruct directly connected with the unrelated business in			ductions. De	duction	ns must be
1	Compensation of officers, directors, and trustees (Part X)				. 1	
2	Salaries and wages					
3	Repairs and maintenance					
4	Bad debts					
5	Interest (attach statement). See instructions					0 120
6	Taxes and licenses				6	9,130.
7	Depreciation (attach Form 4562). See instructions					
8	Less depreciation claimed in Part III and elsewhere on return				8b 9	
9	Depletion  Contributions to deferred componentian plans					
10 11	Contributions to deferred compensation plans					
12	Employee benefit programs  Excess exempt expenses (Part VIII)					
13	Excess readership costs (Part IX)					
14	Other deductions (attach statement)					
15	Total deductions. Add lines 1 through 14					9,130.
16	Unrelated business income before net operating loss deduction. S				·	<u> </u>
	column (C)				16	1,416,024.
17	Deduction for net operating loss. See instructions		Stmt 5	Stmt 7	17	453,353.
18	Unrelated business taxable income. Subtract line 17 from line 1					962,671.
For	Paperwork Reduction Act Notice, see instructions.				Schedul	e A (Form 990-T) 2023

Pag	е	2

i e e e e e e e e e e e e e e e e e e e
Yes No
D
0.
0.
D
_
_
% %
0.
1
0.
0.

Schedule A (Form 990-T) 2023 Page 3

	Interest, Annu		oyalties, and R	ents Fro	om Contr	olled C	Organizatio	ns (s	ee instruc	tions)		rage 3
						E	xempt Contro	lled Or	ganizatior	ıs		
1.	<ol> <li>Name of controlled organization</li> </ol>		identification inco				al of specified nents made	<b>5.</b> Part of column 4 that is included in the controlling organization's gross income		in the aniza-	6. Deductions directly connected with income in column 5	
(1)												
(2)												
(3)												
(4)												
				<del></del>	Controlled O					- 44		
7. Tax	able Income	in	Net unrelated come (loss) e instructions)		otal of specif yments mad		that is inc controlling gross	luded	in the zation's		con	luctions directly nected with e in column 10
(1)												
(2)												
(3)												
(4)												
							Add colum Enter here line 8, c	and or	n Part I,	Ente	er he	umns 6 and 11. re and on Part I, s, column (B).
Totals									0.			0.
Part VII	Investment	Income	of a Section 50	)1(c)(7),	(9), or (17	) Orga	nization (s	ee ins	ructions)			
	<b>1.</b> Desc	cription of	income		2. Amou incor		3. Deduction directly connumber (attach state	ected	4. Set (attach s	asides tateme	nt)	i. Total deductions and set-asides (add cols 3 and 4)
(1)											_	
(2)											+	
(3)											+	
(4)					Add amo	ınts in						Add amounts in
					column 2	. Enter						column 5. Enter
					here and o	,						here and on Part I,
Totals					line 9, colu	0 <b>.</b>						line 9, column (B).
Part VIII	Exploited E	xempt /	Activity Income	. Other	Than Adv		na Income	(see in	structions	)		
1 Des	cription of exploite	•		<i>,</i>				(====				
	<u>.</u>	٠.	e from trade or bus	iness. Ente	er here and o	n Part I	, line 10, colun	nn (A)		2		
<b>3</b> Exp	enses directly con	nected wit	h production of unr	elated bus	siness incom	e. Enter	here and on F	Part I,				
line	10, column (B)									3		
			trade or business.									
lines	s 5 through 7									4		
5 Gro	ss income from ac	tivity that i	s not unrelated bus	iness inco	me					5		
<b>6</b> Exp	enses attributable	to income	entered on line 5							6		
			act line 5 from line 6									
4. E	nter here and on F	Part II, line	12							7		

Schedule A (Form 990-T) 2023

Part	IX	Advertising Income					
1	Nan	ne(s) of periodical(s). Check box if reporting	two or r	more periodicals on a	consolidated bas	sis.	
	<b>A</b> [						
	в						
	c						
	ρĺ						
Entor 1		nts for each periodical listed above in the co	orrospor	nding column			
_111.61 6	ımoui	its for each periodical listed above in the co	onespoi T		В	С	D
_	0		}	Α	Р -	<del></del>	— <del>                                       </del>
2		ss advertising income					0.
	Add	columns A through D. Enter here and on P	art I, line	e 11, column (A)			
а			г		1	-	
3		ct advertising costs by periodical					0.
а	Add	columns A through D. Enter here and on P	Part I, line	e 11, column (B)			<u> </u>
			г		1		
4		ertising gain (loss). Subtract line 3 from line	•				
		or any column in line 4 showing a gain,					
	com	plete lines 5 through 8. For any column in					
	line	4 showing a loss or zero, do not complete					
	lines	s 5 through 7, and enter -0- on line 8	<u>[</u>				
5	Rea	dership costs	Г				
6		ulation income					
7		ess readership costs. If line 6 is less than					
	line	5, subtract line 6 from line 5. If line 5 is less	s				
		line 6, enter -0-					
8		ess readership costs allowed as a					
		uction. For each column showing a gain on	n				
		4, enter the lesser of line 4 or line 7					
а		l line 8, columns A through D. Enter the grea	_	ne line 8a columns to	tal or -0- here and	on	<u>'</u>
		II, line 13					0.
Part	X	Compensation of Officers, Dire	ectors,	and Trustees (s	see instructions)		
				,	,	3. Percentage	4. Compensation
		1. Name		2. Title		of time devoted	attributable to
						to business	unrelated business
1)						%	arriciated bacirioss
2)						%	
<del>_,</del> 3)						%	
4)						%	
.,						,,,	
Total	. Ente	r here and on Part II, line 1					0.
Part		Supplemental Information (see	instructi	ions)			
	<i>-</i>		mondon	10110)			

Form 990-T (A) Income (Loss) from Partnerships	Statement 4
Description	Net Income or (Loss)
Audax Private Equity Fund VI-A, LP - Ordinary Business Income (loss) Benefit Street Partners Special Situations Fund - Ordinary Business Income ( Denham Commodity Partners Fund VI-A - Ordinary Business Income (loss) Encap Energy Capital Fund IX - Ordinary Business Income (loss) Encap Energy Capital Fund X - Ordinary Business Income (loss) Great Hill Equity Partners VII LP - Ordinary Business Income (loss) Knightbridge Venture Capital VI LP Series VC - Ordinary Business Income (los Lyme Forest Fund III TE - Ordinary Business Income (loss) Oaktree Opportunities Fund XB - Ordinary Business Income (loss) Oaktree Opportunities Fund XB AIF (Cayman) - Ordinary Business Income (loss) Oaktree Opportunities Fund XB AIF (Delaware) - Ordinary Business Income (loss)	or (Loss)  6,116.  4.  -31.  268,576.  1,229,293.  -7,965.  -1.  -23.  64,051.  4,167.  -48.
Park St Capital Natural Resource Fund III - Ordinary Business Income (loss) Park St Capital Natural Resource Fund IV - Ordinary Business Income (loss) Park St Capital Natural Resource Fund V - Ordinary Business Income (loss) Park St Capital Natural Resource Fund VI - Ordinary Business Income (loss) Park St Capital Partners Fund V - Ordinary Business Income (loss) TrueBridge Capital Partners Fund VI - Ordinary Business Income (loss) TrueBridge Capital Partners Fund VI - Ordinary Business Income (loss) TrueBridge-Kauffman Fellows Endowment Fund III, L.P Ordinary Business Inc TrueBridge-Kauffman Fellows Endowment Fund IV, L.P Ordinary Business Inco TrueBridge Bain 2014 Special Purpose - Ordinary Business Income (loss) Spur Ventures II, LP - Ordinary Business Income (loss) TrueBridge Capital Partners Fund VII - Ordinary Business Income (loss) Weathergage Venture Capital, LP - Ordinary Business Income	-726. 13,457. 100,117. 7,906. 957. 2,990. 2,169. 4,098. 3422. 3,742.
(loss) Westbrook Real Estate Fund X - Ordinary Business Income (loss) Great Hill Equity Partners VIII LP - Ordinary Business Income (loss)	10,288. -123,055. -57,337.

New Hampsh	ire Charitable F	oundation		02-6005625
Great Hill Ed Income (loss Audax Private Income (loss Trace Energy (loss) CA Resources Ordinary Bust Polaris Grow Varde Fund X	-2,23766,26230,000. 8856,322. 5.			
Form 990-T (2	A)	Post 2017 NOL Sch	edule	Statement 5
Prior Year 1 2017 NOL	Post	NOL Deduction	Carryfor Post 201	
453,	353.	453,353.		0.
990-T Sch A	Post-20	17 Net Operating  Loss Previously	Loss Deduction	Statement 6  Available
Tax Year	Loss Sustained	Applied	Remaining	This Year
12/31/18 12/31/22	631,001. 453,353.	631,001.	453,353.	453,353. ——————

453,353.

453,353.

NOL Carryover Available This Year

Sch A (990-T)	Schedule A NOL Detail	Statement 7
Taxable income fro This entities port	m all entities ion of taxable income	1,442,831. 1,416,024.
	entage of pre-2018 net operating loss wed pre-2018 net operating loss	98.14% 0.
Taxable income aft 80% income limitat	er pre-2018 net operating loss ion	1,416,024. 1,132,819.
Post-2017 availabl Lesser of Post-201	e 7 net operating loss or 80% limitation	453,353. 453,353.

Alternative Minimum Tax-Corporations

Attach to your tax return.

OMB No. 1545-0123

2023

Department of the Treasury Internal Revenue Service Go to www.irs.gov/Form4626 for instructions and the latest information.

Employer identification number Name New Hampshire Charitable Foundation 02-6005625 Is the corporation filing this form a member of a controlled group treated as a single employer under sections 59(k)(1)(D) and 52? Yes If "Yes," the corporation must complete Part V listing the names, EINs, and separate company financial statement income or loss for each member of the controlled group treated as a single employer taken into account in the determination of "applicable corporation" under section 59(k)(1)(D). X No B Is the corporation filing this form a member of a foreign-parented multinational group (FPMG) within the meaning of section 59(k)(2)(B)? If "Yes," the corporation must complete Part V listing the names, EINs, and separate company financial statement income or loss for each member of the FPMG under section 59(k)(2)(B). Applicable Corporation Determination (Report all amounts in U.S. dollars.) If you have already determined in current or prior years you are an applicable corporation, skip Part I and continue to Part II. (c) Third Preceding (a) First Preceding (b) Second Preceding Year Ended Year Ended Year Ended Net income or loss per applicable financial statement(s) (AFS) (see inst): Consolidated net income or loss per the AFS of the corporation 1a Include AFS net income or loss of other includible entities (add net income and subtract net loss) 1b Exclude AFS net income or loss of excludible entities (add net loss and subtract net income) 1c d Adjustment for certain consolidating entries (see instructions) 1d Specified additional net income or loss item B. Reserved for future use 1e AFS net income or loss of all entities in the test group before adjustments. Combine lines 1a through 1d 1f 2 Adjustments: a Financial statements covering different tax years 2a **b** Corporations that are not included on the taxpayer's consolidated return (see instructions) 2b c Pro-rata share of net income from controlled foreign corporations for which the corporation is a U.S. shareholder. If zero or less, enter -0-(see instructions for special rules if completing this form for an FPMG) 2c d Amounts that are not effectively connected to a U.S. trade or business (see instructions for special rules if completing this form for an FPMG) 2d e Certain taxes (see instructions) 2e Patronage dividends and per-unit retain allocations (cooperatives only) 2f **g** Alaska native corporations 2g h Certain credits (see instructions) Mortgage servicing income 2i Tax-exempt entities (organizations subject to tax under section 511) ... 2j Depreciation 2k ..... Qualified wireless spectrum 21 Covered transactions 2m n Adjustments related to bankruptcy and insolvency 2n Certain insurance company adjustments 20 Adjustment P - Reserved for future use 2p Adjustment Q - Reserved for future use 2a Adjustment R - Reserved for future use 2r s Adjustment S - Reserved for future use 2z z Other (see instructions) Specified adjustment. Reserved for future use 3 4 4 Total adjustments. Combine lines 2a through 2z AFSI. Combine lines 1f and 4 AFSI of first, second, and third preceding tax years. Combine columns (a), (b), and (c) of line 5 6 6

LHA For Paperwork Reduction Act Notice, see separate instructions.

3-year average annual AFSI (see instructions)

Form 4626 (2023)

7

Form 4626 (2023) Page **2** 

Part	Applicable Corporation Determination (Report all amo	unts in U.S.	dollars.) (continued	d)	
8	Is line 7 more than \$1 billion?				
	Yes. Continue to line 9.				
	No. STOP here and attach to your tax return.				
9	Is the corporation a member of an FPMG within the meaning of section	59(k)(2)(B)?			
	Yes. Continue to line 10.				
	No. Continue to Part II.	_			
			(a)	(b)	(c)
			First Preceding	Second Preceding	Third Preceding
			Year Ended	Year Ended	Year Ended
10	AFSI for purposes of the \$100 million test before adjustments:				
а	AFSI from line 5	10a			
b	Aggregation differences (see instructions)	10b			
С	Total AFSI for purposes of the \$100 million test before adjustments.				
	Combine lines 10a and 10b	10c			
11	Adjustments:				
а	Income not effectively connected to a U.S. trade or business	11a			
b	Pro-rata share of CFC net income described in section 56A(c)(3)				
	(attach worksheet) (see instructions)	11b			
С	Reserved for future use - Other adjustments 1	11c			
d	Reserved for future use - Other adjustments 2	11d			
12	Total adjustments. Combine lines 11a and 11b	12			
13	Total AFSI for purposes of the \$100 million test. Combine lines				
	10c and 12	13			
14	AFSI of first, second, and third preceding tax years. Combine $$ columns $$	(a), (b), and	(c) of line 13	14	
15	3-year average annual AFSI for purposes of the \$100 million test			15	
16	Is line 15 \$100 million or more?				
	Yes. Continue to Part II.				
	No. STOP here. Attach to your tax return.				
	Troi or or more. Actually to your tax rotain.				Form 4606 (0000)

Form **4626** (2023)

Pai	t II   Corporate Alternative Minimum Tax		
1	Net income or loss per applicable financial statement(s) (AFS) (see instructions):		
а	Consolidated net income or loss per the AFS of the corporation	1a	1,342,983.
b	Include AFS net income or loss of other includible entities (add net income and subtract net loss)	1b	
С	Exclude AFS net income or loss of excludible entities (add net loss and subtract net income)	1c	
d	Adjustment for certain consolidating entries (see instructions)	1d	
е	Specified additional net income or loss item D. Reserved for future use	1e	
f	AFS net income or loss before adjustments. Combine lines 1a through 1d	1f	1,342,983.
2	Adjustments:	<u> </u>	, ,
	Financial statements covering different tax years	2a	
b	Reserved for future use - Adjustment 2b	2b	
c	Corporations that are not included on the taxpayers - consolidated return (see instructions)	2c	
d	The corporation's distributive share of adjusted financial statement income of partnerships	2d	
	Pro-rata share of net income from controlled foreign corporations for which the corporation is a U.S.	Zu	
e	·	000	
	shareholder. If zero or less, enter -0 (See instructions)	2e	
	Amounts that are not effectively connected to a U.S. trade or business	2f	
g	Certain taxes. Enter the amount from Part III, line 7	2g	
h	Patronage dividends and per-unit retain allocations (cooperatives only)	2h	
!	Alaska native corporations	2i	
j	Certain credits (see instructions)	2 <u>j</u>	
k	Mortgage servicing income	2k	
ı	Covered benefit plans described in section 56A(c)(11)(B)	21	
	Tax-exempt entities (organizations subject to tax under section 511)	2m	
n	Depreciation	2n	
0	Qualified wireless spectrum	20	
р	Covered transactions	<b>2</b> p	
q	Adjustments related to bankruptcy and insolvency	2q	
r	Certain insurance company adjustments	2r	
s	AFSI adjustment S - Reserved for future use	2s	
t	AFSI adjustment T - Reserved for future use	2t	
u	AFSI adjustment U - Reserved for future use	2u	
z	Other (see instructions)  Statement 10 *	2z	10,983.
3	Total adjustments. Combine lines 2a through 2z	3	10,983.
4	AFSI before financial statement net operating loss carryover. Combine lines 1f and 3	4	1,353,966.
5	Financial statement net operating loss (FSNOL) (see instructions)	5	
6	AFSI. Subtract line 5 from line 4. If zero or less, enter -0-	6	1,353,966.
7	Multiply line 6 by 15% (0.15)	7	203,095.
8	Corporate alternative minimum tax foreign tax credit (CAMT FTC). Enter amount from Part IV, Section I, line 6 (see inst)	8	
9	Tentative minimum tax. Subtract line 8 from line 7. If zero or less, enter -0-)	9	203,095.
10	Regular tax liability (see instructions)	10	186,822.
11	Base erosion minimum tax (see instructions)	11	0.
12	Combine lines 10 and 11	12	186,822.
13	Alternative minimum tax. Subtract line 12 from line 9. If zero or less, enter -0 Enter here and on Form		
	1120, Schedule J, line 3, or the appropriate line of the corporation's income tax return	13	16,273.
Pai	t III Adjustment for Certain Taxes Under Section 56A(c)(5)		
1	Current income tax provision - Foreign	1	
2	Current income tax provision - Federal	2	
3	Deferred income tax provision - Foreign	3	
4	Deferred income tax provision - Federal	4	
5	Income taxes included in equity method investment income	5	
6 -			
08		6a	
	Adjustment A - Reserved for future use Adjustment B - Reserved for future use	6a 6b	
b	Adjustment A - Reserved for future use Adjustment B - Reserved for future use		
b c	Adjustment A - Reserved for future use Adjustment B - Reserved for future use Adjustment C - Reserved for future use	6b	
t c	Adjustment A - Reserved for future use Adjustment B - Reserved for future use Adjustment C - Reserved for future use Adjustment D - Reserved for future use	6b 6c	
ti c c e	Adjustment A - Reserved for future use  Adjustment B - Reserved for future use  Adjustment C - Reserved for future use  Adjustment D - Reserved for future use  Adjustment E - Reserved for future use	6b 6c 6d	
b c c e f	Adjustment A - Reserved for future use Adjustment B - Reserved for future use Adjustment C - Reserved for future use Adjustment D - Reserved for future use Adjustment E - Reserved for future use Adjustment F - Reserved for future use	6b 6c 6d 6e 6f	
b c c e f	Adjustment A - Reserved for future use Adjustment B - Reserved for future use Adjustment C - Reserved for future use Adjustment D - Reserved for future use Adjustment E - Reserved for future use Adjustment F - Reserved for future use Adjustment G - Reserved for future use	6b 6c 6d 6e 6f 6g	
t c c e f g	Adjustment A - Reserved for future use Adjustment B - Reserved for future use Adjustment C - Reserved for future use Adjustment D - Reserved for future use Adjustment E - Reserved for future use Adjustment F - Reserved for future use	6b 6c 6d 6e 6f	

Form 4626 (2023) Page **4** 

Pa	rt IV Alterna	tive Minimum Tax - Corporations Foreign Tax Credit		
Sec	tion I - AMT I	Foreign Tax Credit		
1	Domestic corpo	ration AMT foreign income taxes:		
а	Total foreign tax	es paid or accrued as reported on Form 1118, Schedule B,		
	Part I, column 2	j) 1a		
b	Adjustment	1b		
С	Adjustment	1c		
d	Adjustment	1d		
е	Adjustment			
f	Adjustment			
g	Adjustment	1g		
2	Total domestic of	orporation AMT foreign income taxes. Combine lines 1a through 1g	. 2	
3	Allowable contro	lled foreign corporation (CFC) AMT foreign income taxes:		
а	Pro-rata share of	CFC AMT foreign income taxes from Part IV, Section II, line		
	11, column (n)	3a		
b	Carryover of exc	ess foreign taxes (from Part IV, Section III, line 4, column (vii))		
С	Total CFC AMT	oreign income taxes. Add lines 3a and 3b	. Зс	
d	Percentage spec	offied in section 55(b)(2)(A)(i) 3d 15	%	
е	Pro-rata share of	CFC net income described in section 56A(c)(3) (attach		
	worksheet) (see	instructions) 3e		
f	CFC AMT foreig	n tax credit limitation (multiply line 3d by line 3e)	. 3f	
g		MT foreign income taxes (lesser of line 3c or line 3f)		
4	CAMT FTC Line	4 - Reserved for future use	. 4	
5	CAMT FTC Line	5 - Reserved for future use	. 5	
6	Total AMT foreig	n income taxes. Combine lines 2 and 3g. Enter this amount on Part II, line 8	. 6	

Form **4626** (2023)

Form 4626 AMT Contribution Limitation	Statement
1) AFS income before FSNOL, charitable contributions 2) Add: Other AMT adjustment and preference items other	. 889,63
than charitable contributions	-10,98
3) Preadjustment AFSI before charitable deductions and FSNOL	878,64
4) Contribution limitation to calculate 80% AFSI limitation for FSNOL (line 10 plus special deductions not previously included in the line 3 above, multiplied by 10%)	. 87,86
5) Total available contributions	
6) Contribution deduction to calculate 80% AFSI limitation for FSNOL (lesser of line 4 or line 5)	. 87,86
7) AFSI for purposes of 80% FSNOL Limitation (line 3 less line 6)	. 632,62
10) AMT FSNOL (lesser of line 8 or line 9)	•
11) AFSI for charitable deduction limitation (line 6 plus special deductions less AMT FSNOL on line 10) . 12) 10% of line 11	878,64 87,86
13) AFSI charitable deduction (lesser of Line 5 or line 12) . 14) Regular contribution deduction	-
15) AFSI contribution adjustment (line 14 less line 13)	. 10,98

Form 4626 AMT Contributions	Statement	9
Carryover of Prior Years Unused Contributions For Tax Year 2018 For Tax Year 2019 For Tax Year 2020 For Tax Year 2021 For Tax Year 2022		
Total Carryover Current Year Contributions	 54,142,7	749
Total Contributions 10% of Taxable Income as Adjusted	54,142,7 87,8	
Excess Contributions	54,054,8	 384
Allowable Contributions	87,8	<del></del> 365

Form 4626	Other AMT Adjustments		
Description		Amount	
Charitable Contributions		10,983	3.
Total to Form 4626, Line 2	2z	10,983	3.

# (Rev. December 2018) Department of the Treasury Internal Revenue Service

### Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Attachment Sequence No. **69** 

Name of shareholder		areholder	Identifying number (see instructions)			
Ne	w H	ampshire Charitable Foundation	02-6005625			
		reet, and room or suite no. If a P.O. box, see instructions.  easant Street	Shareholder tax year: calendar year 2023 or other tax year beginning and ending			
City	or towr	n, state, and ZIP code or country rd, NH 03301-4005				
		of shareholder filing the return: Individual X Corporation Partnershi	p S Corporation	Nongrantor Trust Estate		
		y Excepted Specified Foreign Financial Assets are reported on this form. See instructions .				
	-	nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to tr				
		Corporation under the alternative facts and circumstances test within the meaning of section				
		gn corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) $ee\ Opps\ XB\ Holdco\ LTD$	Employer identification number (if any)			
V 44	(F	nter number street eits er town and country.)	98-1413683	tructions		
Auui	ess (Ei	nter number, street, city or town, and country.)	Reference ID number (see ins	tructions)		
		spital Road e Town, Grand Cayman, CAYMAN ISLANDS KY	Tax year of foreign corporation or other tax year beginning and ending	, PFIC, or QEF: Calendar year $2023$ ,		
	art I	Summary of Annual Information (see instructions)				
		following information with respect to all shares of the PFIC held by the shareholder:				
1	Desc	cription of each class of shares held by the shareholder: Common Stock				
2	Data	☐ Check if shares jointly owned with spouse.  shares acquired during the tax year, if applicable:				
2	Date	Shales acquired during the tax year, if applicable.				
3	Num	ber of shares held at the end of the tax year:				
4	(a)	e of shares held at the end of the tax year (check the appropriate box, if applicable):  \$0-50,000 (b) \( \frac{\textbf{X}}{\textbf{X}} \) \$50,001-100,000 (c) \( \frac{\textbf{X}}{\textbf{X}} \) \$100,001-150,000    If more than \$200,000, list value:	(d) \$150,001-200,00	00		
5	<ul> <li>Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):</li> <li>(a) Section 1291 \$</li> </ul>					
	(b)	Section 1293 (Qualified Electing Fund) \$				
	(c)	Section 1296 (Mark to Market) \$	See	Statement 11		
_	art II					
A B		Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you ma 1294(c) and 1294(f) and the related regulations for events that terminate this election.	he time for payment of tax on the calculate the tax that may be	e undistributed earnings and profits pe deferred.		
С		Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-mark 1296(e). Complete Part IV.	ket the PFIC stock that is market	able within the meaning of section		
D		<b>Deemed Sale Election</b> . I, a shareholder on the first day of a PFIC's first tax year as a QEF PFIC. Enter gain or loss on line 15f of Part V.	, elect to recognize gain on the o	deemed sale of my interest in the		
E		<b>Deemed Dividend Election.</b> I, a shareholder on the first day of a PFIC's first tax year as a amount equal to my share of the post-1986 earnings and profits of the CFC as an excess excess distribution is greater than zero, also complete line 16 of Part V.				
F		<b>Election To Recognize Gain on Deemed Sale of PFIC.</b> I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.				
G		<b>Deemed Dividend Election With Respect to a Section 1297(e) PFIC.</b> I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). E distribution is greater than zero, also complete line 16, Part V.	) PFIC. My holding period in the inter the excess distribution	stock of the Section 1297(e) on line 15e, Part V. If the excess		
Н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16. Part V.	iod in the stock of the former PF	IC includes the termination date, as		

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making						
	Election B, also complete lines 8a through 9c. See instructions.						
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a					
b	Enter the portion of line 6a that is included in income under section 951 or that may be						
	excluded under section 1293(g) 6b						
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c			
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a					
b	Enter the portion of line 7a that is included in income under section 951 or that may be						
	excluded under section 1293(g)	7b					
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun						
	used for your income tax return. See instructions			7c			
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.				
8 a	Add lines 6c and 7c		 I	8a			
b	Enter the total amount of cash and the fair market value of other property distributed						
	or deemed distributed to you during the tax year of the QEF. See instructions	8b					
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares						
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c					
d	Add lines 8b and 8c			8d			
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e			
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,				
	you may make Election B with respect to the amount on line 8e.	1 .	I				
	Enter the total tax for the tax year. See instructions	9a		_			
b	Enter the total tax for the tax year determined without regard to the amount entered	l					
	on line 8e	9b		_			
C	c Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is extended by making						
D	Election B		ianal	9c			
	art IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>		
	Enter the fair market value of your PFIC stock at the end of the tax year			10a			
				10b			
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the least set of the last		-	40.			
	on your tax return. If a loss, go to line 11			10c			
	Enter any unreversed inclusions (as defined in section 1296(d))			11			
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			10			
10	loss on your tax return			12			
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the	-		13a			
	Enter the fair market value of the stock on the date of sale or disposition			13b			
	Enter the adjusted basis of the stock on the date of sale or disposition  Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your			100			
·				13c			
142	tax return. If a loss, go to line 14  Enter any unreversed inclusions (as defined in section 1296(d))			14a			
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- ""			
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b			
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I						
	return according to the rules generally applicable for losses provided elsewhere in the Code and regulations			14c			
	Note: See instructions in case of multiple sales or dispositions.						

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

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current tax year.

25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19

26 Interest accrued after partial termination of election.

Subtract line 24 from line 20

# (Rev. December 2018) Department of the Treasury Internal Revenue Service

### Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Attachment Sequence No. **69** 

Name of shareholder		Identifying number (see instructions)			
New H	ampshire Charitable Foundation	02-6005625			
Number, st	reet, and room or suite no. If a P.O. box, see instructions.	Shareholder tax year: calendar year 2023 or other tax year beginning			
	easant Street	, and ending ,			
	n, state, and ZIP code or country ord, NH 03301-4005				
	of shareholder filing the return: Individual X Corporation Partnershi	p S Corporation Nongrantor Trust Estate			
	y Excepted Specified Foreign Financial Assets are reported on this form. See instructions .				
	nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to tr				
	Corporation under the alternative facts and circumstances test within the meaning of section				
	ign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)  Hartree Maritime CTB LTD	Employer identification number (if any)			
·PP·		98-1398234			
Address (E	nter number, street, city or town, and country.)	Reference ID number (see instructions)			
27 но	spital Road	Tax year of foreign corporation, PFIC, or QEF: Calendar year 202			
	e Town, Grand Cayman, CAYMAN ISLANDS KY	or other tax year beginning			
	, <u>.</u> ,	and ending , .			
Part I	Summary of Annual Information (see instructions)				
	following information with respect to all shares of the PFIC held by the shareholder:				
1 Desc	cription of each class of shares held by the shareholder: Common Stock				
 • Doto	☐ Check if shares jointly owned with spouse. • shares acquired during the tax year, if applicable:				
2 Date	s shales acquired during the tax year, if applicable.				
3 Num	nber of shares held at the end of the tax year:				
4 Valu					
	e of shares held at the end of the tax year (check the appropriate box, if applicable): $X$ \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000	(d) \$150,001-200,000			
٠,	If more than \$200,000, list value:	(u) \$\int \pi \tau \tau \tau \tau \tau \tau \tau \tau			
( )					
<b>5</b> Type	e of PFIC and amount of any excess distribution or gain treated as an excess distribution ur	nder section 1291, inclusion under section 1293,			
	inclusion or deduction under section 1296 (check all boxes that apply):				
(a)	Section 1291 \$				
(b)	Section 1293 (Qualified Electing Fund) \$	See Statement 12			
(c) Part II	Section 1296 (Mark to Market) \$  Elections (see instructions)	See Statement 12			
A	Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as	a QEF. Complete lines 6a through 7c of Part III.			
В	Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the	he time for payment of tax on the undistributed earnings and profits			
	of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you ma				
	1294(c) and 1294(f) and the related regulations for events that terminate this election.				
С	Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-mark 1296(e). Complete Part IV.	ket the PFIC stock that is marketable within the meaning of section			
<b>D</b>	<b>Deemed Sale Election.</b> I, a shareholder on the first day of a PFIC's first tax year as a QEF	, elect to recognize gain on the deemed sale of my interest in the			
	PFIC. Enter gain or loss on line 15f of Part V.				
E	Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a	• • • • • •			
	amount equal to my share of the post-1986 earnings and profits of the CFC as an excess excess distribution is greater than zero, also complete line 16 of Part V.	uisilibulioli. Enter this amount on line 15e of Part V. If the			
F $\square$	, ,	or a PEIC to which section 1297(d) applies, elect to treat as an eyes			
F Location To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to trigger distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(gain on line 15f of Part V.					
	a section 1297(e) PFIC, within the meaning of Regulations section				
G ∐	1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e	) PFIC. My holding period in the stock of the Section 1297(e)			
	PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). E distribution is greater than zero, also complete line 16, Part V.	enter the excess distribution on line 15e, Part V. If the exces			
н 🗆	Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former				
•• —	elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e				
	complete line 16, Part V.	,			

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making						
	Election B, also complete lines 8a through 9c. See instructions.						
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a					
b	Enter the portion of line 6a that is included in income under section 951 or that may be						
	excluded under section 1293(g) 6b						
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c			
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a					
b	Enter the portion of line 7a that is included in income under section 951 or that may be						
	excluded under section 1293(g)	7b					
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun						
	used for your income tax return. See instructions			7c			
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.				
8 a	Add lines 6c and 7c		 I	8a			
b	Enter the total amount of cash and the fair market value of other property distributed						
	or deemed distributed to you during the tax year of the QEF. See instructions	8b					
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares						
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c					
d	Add lines 8b and 8c			8d			
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e			
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,				
	you may make Election B with respect to the amount on line 8e.	1 .	I				
	Enter the total tax for the tax year. See instructions	9a		_			
b	Enter the total tax for the tax year determined without regard to the amount entered	l					
	on line 8e	9b		_			
C	c Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is extended by making						
D	Election B		ianal	9c			
	art IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>		
	Enter the fair market value of your PFIC stock at the end of the tax year			10a			
				10b			
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the least set of the last		-	40.			
	on your tax return. If a loss, go to line 11			10c			
	Enter any unreversed inclusions (as defined in section 1296(d))			11			
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			10			
10	loss on your tax return			12			
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the	-		13a			
	Enter the fair market value of the stock on the date of sale or disposition			13b			
	Enter the adjusted basis of the stock on the date of sale or disposition  Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your			100			
·				13c			
142	tax return. If a loss, go to line 14  Enter any unreversed inclusions (as defined in section 1296(d))			14a			
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- ""			
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b			
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I						
	return according to the rules generally applicable for losses provided elsewhere in the Code and regulations			14c			
	Note: See instructions in case of multiple sales or dispositions.						

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

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current tax year.

25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19

26 Interest accrued after partial termination of election.

Subtract line 24 from line 20

# (Rev. December 2018) Department of the Treasury Internal Revenue Service

### Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Attachment Sequence No. **69** 

Name of shareholder			Identifying number (see instructions)				
Ne	w H	ampshire Charitable Foundation	02-6005625				
		reet, and room or suite no. If a P.O. box, see instructions.  easant Street	Shareholder tax year: calendar year 2023 or other tax year beginning , and ending ,	_			
		n, state, and ZIP code or country					
		of shareholder filing the return: Individual X Corporation Partnershi	p S Corporation Nongrantor Trust Estate	_			
Che	ck if any	y Excepted Specified Foreign Financial Assets are reported on this form. See instructions .					
		nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to tr		_			
		Corporation under the alternative facts and circumstances test within the meaning of section		_			
Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) Calypso Investments Holdings LTD			Employer identification number (if any)				
			98-1604088				
Addı	ress (Eı	nter number, street, city or town, and country.)	Reference ID number (see instructions)				
27	Но	spital Road	Tax year of foreign corporation, PFIC, or QEF: Calendar year 202	23			
		e Town, Grand Cayman, CAYMAN ISLANDS KY	or other tax year beginning , and ending ,				
P	art I	Summary of Annual Information (see instructions)	,	_			
Prov	/ide the	following information with respect to all shares of the PFIC held by the shareholder:					
1	Desc	cription of each class of shares held by the shareholder: Common Stock					
		Check if shares jointly owned with spouse.					
2	Date	shares acquired during the tax year, if applicable:					
3	Num	nber of shares held at the end of the tax year:					
	Valu						
4		e of shares held at the end of the tax year (check the appropriate box, if applicable):  X \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000	(d) \$150,001-200,000				
	٠,	If more than \$200,000, list value:	(u) \$150,001-200,000				
	(0)	11 111010 than \$\pi_200,000, not value.					
5	Type	Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293,					
		inclusion or deduction under section 1296 (check all boxes that apply):	,				
	(a)	Section 1291 \$					
	(b)	Section 1293 (Qualified Electing Fund) \$					
	(c)	Section 1296 (Mark to Market) \$	See Statement 13				
Р		Elections (see instructions)					
Α	Ш	<b>Election To Treat the PFIC as a QEF.</b> I, a shareholder of a PFIC, elect to treat the PFIC as					
В		Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.					
С		<b>Election To Mark-to-Market PFIC Stock</b> . I, a shareholder of a PFIC, elect to mark-to-mark 1296(e). Complete Part IV.	ket the PFIC stock that is marketable within the meaning of section				
D		<b>Deemed Sale Election.</b> I, a shareholder on the first day of a PFIC's first tax year as a QEF PFIC. Enter gain or loss on line 15f of Part V.	, elect to recognize gain on the deemed sale of my interest in the				
E		<b>Deemed Dividend Election.</b> I, a shareholder on the first day of a PFIC's first tax year as a amount equal to my share of the post-1986 earnings and profits of the CFC as an excess excess distribution is greater than zero, also complete line 16 of Part V.	• , ,,	1			
_		, ,	DEIO to which continue 4007/ 15 Providence 4				
F		<b>Election To Recognize Gain on Deemed Sale of PFIC.</b> I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.		ess			
G		<b>Deemed Dividend Election With Respect to a Section 1297(e) PFIC.</b> I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). E distribution is greater than zero, also complete line 16, Part V.	) PFIC. My holding period in the stock of the Section 1297(e) inter the excess distribution on line 15e, Part V. If the excess				
Н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16. Part V	iod in the stock of the former PFIC includes the termination date, a	S			

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making						
	Election B, also complete lines 8a through 9c. See instructions.						
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a					
b	Enter the portion of line 6a that is included in income under section 951 or that may be						
	excluded under section 1293(g) 6b						
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c			
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a					
b	Enter the portion of line 7a that is included in income under section 951 or that may be						
	excluded under section 1293(g)	7b					
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun						
	used for your income tax return. See instructions			7c			
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.				
8 a	Add lines 6c and 7c		 I	8a			
b	Enter the total amount of cash and the fair market value of other property distributed						
	or deemed distributed to you during the tax year of the QEF. See instructions	8b					
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares						
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c					
d	Add lines 8b and 8c			8d			
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack	kets)		8e			
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,				
	you may make Election B with respect to the amount on line 8e.	1 .	I				
	Enter the total tax for the tax year. See instructions	9a		_			
b	Enter the total tax for the tax year determined without regard to the amount entered	l					
	on line 8e	9b		_			
C	c Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is extended by making						
D	Election B		ianal	9c			
	art IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>		
	Enter the fair market value of your PFIC stock at the end of the tax year			10a			
				10b			
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the least set of the last		-	40.			
	on your tax return. If a loss, go to line 11			10c			
	Enter any unreversed inclusions (as defined in section 1296(d))			11			
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			10			
10	loss on your tax return			12			
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the	-		13a			
	Enter the fair market value of the stock on the date of sale or disposition			13b			
	Enter the adjusted basis of the stock on the date of sale or disposition  Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your			100			
·				13c			
142	tax return. If a loss, go to line 14  Enter any unreversed inclusions (as defined in section 1296(d))			14a			
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- ""			
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b			
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I						
	return according to the rules generally applicable for losses provided elsewhere in the Code and regulations			14c			
	Note: See instructions in case of multiple sales or dispositions.						

#### Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Part V Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

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current tax year.

25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19

26 Interest accrued after partial termination of election.

Subtract line 24 from line 20

## (Rev. December 2018) Department of the Treasury Internal Revenue Service

## Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Attachment Sequence No. **69** 

Nam	e of sh	areholder	Identifying number (see instructions)				
Ne	w H	ampshire Charitable Foundation	02-6005625				
Num	ber, st	reet, and room or suite no. If a P.O. box, see instructions.	Shareholder tax year: calendar year 2023 or other tax year beginning				
		easant Street	, and ending ,				
		n, state, and ZIP code or country rd, NH 03301–4005					
Che	ck type	of shareholder filing the return: Individual X Corporation Partnershi	p S Corporation Nongrantor Trust Estate				
		y Excepted Specified Foreign Financial Assets are reported on this form. See instructions .					
		nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to tr					
		Corporation under the alternative facts and circumstances test within the meaning of section					
		gn corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) ${\tt earl}~2~{\tt Holdings}~{\tt LTD}$	Employer identification number (if any)				
	<u></u>		98-1398962				
Add	ress (Ei	nter number, street, city or town, and country.)	Reference ID number (see instructions)				
27	Но	spital Road	Tax year of foreign corporation, PFIC, or QEF: Calendar year 2023				
Ge	org	e Town, Grand Cayman, CAYMAN ISLANDS KY	or other tax year beginning , and ending ,				
P	art I	Summary of Annual Information (see instructions)	, .				
Prov	ide the	following information with respect to all shares of the PFIC held by the shareholder:					
1	Desc	cription of each class of shares held by the shareholder: Common Stock					
		Check if shares jointly owned with spouse.					
2	Date	shares acquired during the tax year, if applicable:					
3	Num	ber of shares held at the end of the tax year:					
4		e of shares held at the end of the tax year (check the appropriate box, if applicable): $X$ \$0-50,000 (b) $S$ 50,001-100,000 (c) $S$ 100,001-150,000	(4)				
	٠,	\$0-50,000	(d) \$150,001-200,000				
	(6)	ii iiiote tilati \$200,000, list value.					
5	Type	e of PFIC and amount of any excess distribution or gain treated as an excess distribution ur	nder section 1291, inclusion under section 1293				
		inclusion or deduction under section 1296 (check all boxes that apply):	,,,,,,				
	(a)	Section 1291 \$					
	(b)	Section 1293 (Qualified Electing Fund) \$					
	(c)	Section 1296 (Mark to Market) \$	See Statement 14				
P	art II						
Α	Щ	Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as	•				
В		election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend to of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you ma 1294(c) and 1294(f) and the related regulations for events that terminate this election.	o calculate the tax that may be deferred.				
С		<b>Election To Mark-to-Market PFIC Stock</b> . I, a shareholder of a PFIC, elect to mark-to-mark 1296(e). <i>Complete Part IV</i> .	xet the PFIC stock that is marketable within the meaning of section				
D		<b>Deemed Sale Election</b> . I, a shareholder on the first day of a PFIC's first tax year as a QEF PFIC. Enter gain or loss on line 15f of Part V.	, elect to recognize gain on the deemed sale of my interest in the				
Ε		Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a					
		amount equal to my share of the post-1986 earnings and profits of the CFC as an excess excess distribution is greater than zero, also complete line 16 of Part V.	distribution. Enter this amount on line 15e of Part V. If the				
F		<b>Election To Recognize Gain on Deemed Sale of PFIC.</b> I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last $gain\ on\ line\ 15f\ of\ Part\ V.$					
G		Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Edistribution is greater than zero, also complete line 16. Part V	) PFIC. My holding period in the stock of the Section 1297(e)				
Н	distribution is greater than zero, also complete line 16, Part V.  Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.						

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making				
	Election B, also complete lines 8a through 9c. See instructions.				
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a			
b	Enter the portion of line 6a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	6b			
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a			
b	Enter the portion of line 7a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	7b			
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun				
	used for your income tax return. See instructions			7c	
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.		
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed				
	or deemed distributed to you during the tax year of the QEF. See instructions	8b			
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c			
d	Add lines 8b and 8c			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,		
	you may make Election B with respect to the amount on line 8e.	1 .	i.		
	Enter the total tax for the tax year. See instructions	9a		4	
b	Enter the total tax for the tax year determined without regard to the amount entered	١			
	on line 8e	9b	<u> </u>	4	
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making		
D	Election B		ional	9c	
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>
	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
				10b	
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of the last restriction of the last restriction of the last restriction.		-	۱.,	
	on your tax return. If a loss, go to line 11			10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0	
10	loss on your tax return			12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the Enter the fair market value of the stock on the date of sale or disposition	-		13a	
				13b	
	b Enter the adjusted basis of the stock on the date of sale or disposition  c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your			130	
·				13c	
1 <b>4</b> 2	tax return. If a loss, go to line 14  4a Enter any unreversed inclusions (as defined in section 1296(d))			14a	
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·	
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I				
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c	
	Note: See instructions in case of multiple sales or dispositions.				

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## (Rev. December 2018) Department of the Treasury Internal Revenue Service

## Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Attachment Sequence No. **69** 

Nan	ne of sh	areholder	Identifying number (see instructions)
Ne	w H	ampshire Charitable Foundation	02-6005625
		reet, and room or suite no. If a P.O. box, see instructions.	Shareholder tax year: calendar year $2023$ or other tax year beginning
37	P1	easant Street	, and ending ,
		n, state, and ZIP code or country rd, NH 03301–4005	
Che	ck type	of shareholder filing the return: Individual X Corporation Partnershi	p S Corporation Nongrantor Trust Estate
		y Excepted Specified Foreign Financial Assets are reported on this form. See instructions .	
		nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to tr	
		Corporation under the alternative facts and circumstances test within the meaning of section	
		gn corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) rient Investments PTE LTD	Employer identification number (if any)
			98-1501978
Add	ress (Ei	nter number, street, city or town, and country.)	Reference ID number (see instructions)
9	Raf	fles Place, #26-01	Tax year of foreign corporation, PFIC, or QEF: Calendar year 2023
Re	pub	lic Plaza, Singapore, SINGAPORE 048619	or other tax year beginning , and ending , .
P	art I	Summary of Annual Information (see instructions)	,
Prov		following information with respect to all shares of the PFIC held by the shareholder:	
1	Desc	cription of each class of shares held by the shareholder: Common Stock	
		Check if shares jointly owned with spouse.	
2	Date	shares acquired during the tax year, if applicable:	
3	Num	ber of shares held at the end of the tax year:	
	Valu		
4		e of shares held at the end of the tax year (check the appropriate box, if applicable): $X$ \$0-50,000 (b) $S$ 50,001-100,000 (c) $S$ 100,001-150,000	(d) \$150,001-200,000
	٠,	If more than \$200,000, list value:	(u) \$130,001-200,000
	(0)	11 more than \$250,000, not value.	
5	Type	e of PFIC and amount of any excess distribution or gain treated as an excess distribution ur	nder section 1291, inclusion under section 1293,
		inclusion or deduction under section 1296 (check all boxes that apply):	
	(a)	Section 1291 \$	
	(b)	Section 1293 (Qualified Electing Fund) \$	
	(c)	Section 1296 (Mark to Market) \$	See Statement 15
<u>P</u>	art II		
Α		Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as	•
В		election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend to of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you ma 1294(c) and 1294(f) and the related regulations for events that terminate this election.	o calculate the tax that may be deferred.
С		<b>Election To Mark-to-Market PFIC Stock</b> . I, a shareholder of a PFIC, elect to mark-to-mark 1296(e). <i>Complete Part IV</i> .	xet the PFIC stock that is marketable within the meaning of section
D		<b>Deemed Sale Election</b> . I, a shareholder on the first day of a PFIC's first tax year as a QEF PFIC. Enter gain or loss on line 15f of Part V.	, elect to recognize gain on the deemed sale of my interest in the
Ε		Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a	
		amount equal to my share of the post-1986 earnings and profits of the CFC as an excess excess distribution is greater than zero, also complete line 16 of Part V.	distribution. Enter this amount on line 15e of Part V. If the
F		<b>Election To Recognize Gain on Deemed Sale of PFIC.</b> I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.	
G		Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Edistribution is greater than zero, also complete line 16, Part V.	PFIC. My holding period in the stock of the Section 1297(e)
Н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16, Part V.	iod in the stock of the former PFIC includes the termination date, as

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making				
	Election B, also complete lines 8a through 9c. See instructions.				
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a			
b	Enter the portion of line 6a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	6b			
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a			
b	Enter the portion of line 7a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	7b			
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun				
	used for your income tax return. See instructions			7c	
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.		
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed				
	or deemed distributed to you during the tax year of the QEF. See instructions	8b			
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c			
d	Add lines 8b and 8c			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,		
	you may make Election B with respect to the amount on line 8e.	1 .	i.		
	Enter the total tax for the tax year. See instructions	9a		4	
b	Enter the total tax for the tax year determined without regard to the amount entered	١			
	on line 8e	9b	<u> </u>	4	
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making		
D	Election B		ional	9c	
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>
	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
				10b	
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of the last restriction of the last restriction of the last restriction.		-	۱.,	
	on your tax return. If a loss, go to line 11			10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0	
10	loss on your tax return			12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the Enter the fair market value of the stock on the date of sale or disposition	-		13a	
				13b	
	b Enter the adjusted basis of the stock on the date of sale or disposition  c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your			130	
·				13c	
1 <b>4</b> 2	tax return. If a loss, go to line 14  4a Enter any unreversed inclusions (as defined in section 1296(d))			14a	
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·	
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I				
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c	
	Note: See instructions in case of multiple sales or dispositions.				

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## (Rev. December 2018) Department of the Treasury Internal Revenue Service

## Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Attachment Sequence No. **69** 

Name	of shareholder	Identifying number (see instructions)
New	v Hampshire Charitable Foundation	02-6005625
Numbe	er, street, and room or suite no. If a P.O. box, see instructions.  Pleasant Street	Shareholder tax year: calendar year 2023 or other tax year beginning , and ending ,
City or	r town, state, and ZIP code or country acord, NH 03301-4005	
	type of shareholder filing the return: Individual X Corporation	Partnership S Corporation Nongrantor Trust Estate
Check	if any Excepted Specified Foreign Financial Assets are reported on this form. See in	nstructions
-	ying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation	
	ance Corporation under the alternative facts and circumstances test within the mear	
	of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) ${f I}$ ${f Jade}$ ${f LTD}$	Employer identification number (if any)  98-1440247
Addres	ess (Enter number, street, city or town, and country.)	Reference ID number (see instructions)
Auuro	33 (Effet flumber, street, only of town, and country.)	reference in maniper (see instructions)
Cau	F Lee Garden, Room 1901 seway Bay, Hong Kong, HONG KONG	Tax year of foreign corporation, PFIC, or QEF: Calendar year $2023$ or other tax year beginning , and ending , .
	art I Summary of Annual Information (see instructions)	
	de the following information with respect to all shares of the PFIC held by the sharel	
1	Description of each class of shares held by the shareholder: Common St	OCK
2	Check if shares jointly owned with spouse.	
2	Date shares acquired during the tax year, if applicable:	
3	Number of shares held at the end of the tax year:	
	Value of shares held at the end of the tax year (check the appropriate box, if applic	
	(a) \$0-50,000 (b) X \$50,001-100,000 (c) \$100,00	1-150,000 <b>(d)</b> \$150,001-200,000
	(e) If more than \$200,000, list value:	
5	Type of PFIC and amount of any excess distribution or gain treated as an excess d	istribution under section 1291, inclusion under section 1293.
	and inclusion or deduction under section 1296 (check all boxes that apply):	,
	(a) Section 1291 \$	
	(b) Section 1293 (Qualified Electing Fund) \$	_
	(c) Section 1296 (Mark to Market) \$	See Statement 16
	rt II Elections (see instructions)	
<b>A</b> [	Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to trea  Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, election the QEF until this election is terminated. Complete lines 8a through 9c	ct to extend the time for payment of tax on the undistributed earnings and profits
	<b>Note:</b> If any portion of line 6a or line 7a of Part III is includible under section 1294(c) and 1294(f) and the related regulations for events that terminate this	951, you may <b>not</b> make this election. Alsó, see sections s election.
C	Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to 1296(e). Complete Part IV.	mark-to-market the PFIC stock that is marketable within the meaning of section
D [	<b>Deemed Sale Election</b> . I, a shareholder on the first day of a PFIC's first tax y PFIC. Enter gain or loss on line 15f of Part V.	year as a QEF, elect to recognize gain on the deemed sale of my interest in the
E	Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first amount equal to my share of the post-1986 earnings and profits of the CFC a excess distribution is greater than zero, also complete line 16 of Par	
F [	Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a distribution the gain recognized on the deemed sale of my interest in the PFI gain on line 15f of Part V.	former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess C on the last day of its last tax year as a PFIC under section 1297(a). <i>Enter</i>
G [	1.1297-3(a), elect to make a deemed dividend election with respect to the Se	pareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) 1297-3(d). Enter the excess distribution on line 15e, Part V. If the excess
н [	Deemed Dividend Election With Respect to a Former PFIC. I, a shareholde elect to make a deemed dividend election with respect to the former PFIC. M	r of a former PFIC, within the meaning of Regulations section 1.1298-3(a), y holding period in the stock of the former PFIC includes the termination date, as on line 15e, Part V. If the excess distribution is greater than zero, also

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making				
	Election B, also complete lines 8a through 9c. See instructions.				
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a			
b	Enter the portion of line 6a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	6b			
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a			
b	Enter the portion of line 7a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	7b			
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun				
	used for your income tax return. See instructions			7c	
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.		
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed				
	or deemed distributed to you during the tax year of the QEF. See instructions	8b			
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c			
d	Add lines 8b and 8c			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,		
	you may make Election B with respect to the amount on line 8e.	1 .	i.		
	Enter the total tax for the tax year. See instructions	9a		4	
b	Enter the total tax for the tax year determined without regard to the amount entered	١			
	on line 8e	9b	<u> </u>	4	
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making		
D	Election B		ional	9c	
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>
	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
				10b	
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of the last restriction of the last restriction of the last restriction.		-	۱.,	
	on your tax return. If a loss, go to line 11			10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0	
10	loss on your tax return			12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the Enter the fair market value of the stock on the date of sale or disposition	-		13a	
				13b	
	b Enter the adjusted basis of the stock on the date of sale or disposition  c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your			130	
·				13c	
1 <b>4</b> 2	tax return. If a loss, go to line 14  4a Enter any unreversed inclusions (as defined in section 1296(d))			14a	
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·	
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I				
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c	
	Note: See instructions in case of multiple sales or dispositions.				

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## (Rev. December 2018) Department of the Treasury Internal Revenue Service

## Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Attachment Sequence No. **69** 

Name of shareholder			Identifying number (see instructions)
Ne	w H	ampshire Charitable Foundation	02-6005625
		reet, and room or suite no. If a P.O. box, see instructions. easant Street	Shareholder tax year: calendar year 2023 or other tax year beginning , and ending ,
		n, state, and ZIP code or country rd, NH 03301-4005	
		of shareholder filing the return: Individual X Corporation Partnershi	ip S Corporation Nongrantor Trust Estate
		Excepted Specified Foreign Financial Assets are reported on this form. See instructions	
Qual	ifying l	nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to tr	eat such stock as the stock of a Qualifying
Insu	rance C	Corporation under the alternative facts and circumstances test within the meaning of sectio	n 1297(f)(2). See instructions
		gn corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) FPI Holdings Singapore PTE LTD	Employer identification number (if any)
			98-1443576
Add	ress (Ei	nter number, street, city or town, and country.)	Reference ID number (see instructions)
9	Raf	fles Place, #26-01	Tax year of foreign corporation, PFIC, or QEF: Calendar year 2023
		lic Plaza, Singapore, SINGAPORE 048619	or other tax year beginning , and ending ,
P	art I	Summary of Annual Information (see instructions)	,
Prov	ide the	following information with respect to all shares of the PFIC held by the shareholder:	
1	Desc	cription of each class of shares held by the shareholder: Common Stock	
		Check if shares jointly owned with spouse.	
2	Date	shares acquired during the tax year, if applicable:	
3	Num	ber of shares held at the end of the tax year:	
4		e of shares held at the end of the tax year (check the appropriate box, if applicable):  \$0-50,000 (b) \$50,001-100,000 (c) \$\text{X}\$	(4)
	` '		(d) \$150,001-200,000
	(6)	If more than \$200,000, list value:	<del></del>
5	Type	of PFIC and amount of any excess distribution or gain treated as an excess distribution u	nder section 1291, inclusion under section 1293
·		inclusion or deduction under section 1296 (check all boxes that apply):	idel decited 1201, includion and decited 1200,
	(a)	Section 1291 \$	
	(b)	Section 1293 (Qualified Electing Fund) \$	
	(c)	Section 1296 (Mark to Market) \$	See Statement 17
P	art II	Elections (see instructions)	
Α		Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as	a QEF. Complete lines 6a through 7c of Part III.
В		Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend t of the QEF until this election is terminated. <i>Complete lines 8a through 9c of Part III to</i> Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you ma 1294(c) and 1294(f) and the related regulations for events that terminate this election.	o calculate the tax that may be deferred.
С		<b>Election To Mark-to-Market PFIC Stock</b> . I, a shareholder of a PFIC, elect to mark-to-mark 1296(e). Complete Part IV.	ket the PFIC stock that is marketable within the meaning of section
D		<b>Deemed Sale Election.</b> I, a shareholder on the first day of a PFIC's first tax year as a QEF PFIC. Enter gain or loss on line 15f of Part V.	e, elect to recognize gain on the deemed sale of my interest in the
Ε		<b>Deemed Dividend Election.</b> I, a shareholder on the first day of a PFIC's first tax year as a amount equal to my share of the post-1986 earnings and profits of the CFC as an excess excess distribution is greater than zero, also complete line 16 of Part V.	
F		Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.	
G		Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). E distribution is greater than zero, also complete line 16, Part V.	e) PFIC. My holding period in the stock of the Section 1297(e)
Н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16. Part V	riod in the stock of the former PFIC includes the termination date, as

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making				
	Election B, also complete lines 8a through 9c. See instructions.				
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a			
b	Enter the portion of line 6a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	6b			
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a			
b	Enter the portion of line 7a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	7b			
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun				
	used for your income tax return. See instructions			7c	
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.		
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed				
	or deemed distributed to you during the tax year of the QEF. See instructions	8b			
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c			
d	Add lines 8b and 8c			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,		
	you may make Election B with respect to the amount on line 8e.	1 .	i.		
	Enter the total tax for the tax year. See instructions	9a		4	
b	Enter the total tax for the tax year determined without regard to the amount entered	١			
	on line 8e	9b	<u> </u>	4	
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making		
D	Election B		ional	9c	
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>
	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
				10b	
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of th		-	۱.,	
	on your tax return. If a loss, go to line 11			10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0	
10	loss on your tax return			12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the Enter the fair market value of the stock on the date of sale or disposition	-		13a	
				13b	
	b Enter the adjusted basis of the stock on the date of sale or disposition  c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your			130	
·				13c	
1 <b>4</b> 2	tax return. If a loss, go to line 14  4a Enter any unreversed inclusions (as defined in section 1296(d))			14a	
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·	
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I				
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c	
	Note: See instructions in case of multiple sales or dispositions.				

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## Form **8621**(Rev. December 2018)

### Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

OMB No. 1545-1002

Attachment ► Go to www.irs.gov/Form8621 for instructions and the latest information. Sequence No. 69 **Identifying number** (see instructions) Name of shareholder New Hampshire Charitable Foundation 02-6005625 Number, street, and room or suite no. If a P.O. box, see instructions. Shareholder tax year: calendar year 2023 or other tax year beginning 37 Pleasant Street and ending City or town, state, and ZIP code or country Concord, NH 03301-4005 Check type of shareholder filing the return: Individual X Corporation Partnership S Corporation Nongrantor Trust Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) Employer identification number (if any) India AIF Trust Holdings Singapore PTE LTD 98-1443765 Address (Enter number, street, city or town, and country.) Reference ID number (see instructions) 9 Raffles Place, #26-01 Tax year of foreign corporation, PFIC, or QEF: Calendar year  $\overline{2023}$ republic Plaza, Singapore, SINGAPORE 048619 or other tax year beginning and ending Summary of Annual Information (see instructions) Provide the following information with respect to all shares of the PFIC held by the shareholder: Description of each class of shares held by the shareholder: Common Stock Check if shares jointly owned with spouse. Date shares acquired during the tax year, if applicable: Number of shares held at the end of the tax year: Value of shares held at the end of the tax year (check the appropriate box, if applicable): (b) \$50.001-100.000 (c) X \$100.001-150.000 \$150.001-200.000 (e) If more than \$200,000, list value: Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply): Section 1291 \$ Section 1293 (Qualified Electing Fund) \$ (b) See Statement 18 (c) L Section 1296 (Mark to Market) \$ Part II Elections (see instructions) Lection To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III. Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.

Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections В 1294(c) and 1294(f) and the related regulations for events that terminate this election. Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e), Complete Part IV. Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line 15f of Part V. Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an Εl amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part V. Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line 15f of Part V. Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V. Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as

defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also

complete line 16. Part V.

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making				
	Election B, also complete lines 8a through 9c. See instructions.				
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a			
b	Enter the portion of line 6a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	6b			
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a			
b	Enter the portion of line 7a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	7b			
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun				
	used for your income tax return. See instructions			7c	
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.		
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed				
	or deemed distributed to you during the tax year of the QEF. See instructions	8b			
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c			
d	Add lines 8b and 8c			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,		
	you may make Election B with respect to the amount on line 8e.	1 .	i.		
	Enter the total tax for the tax year. See instructions	9a		4	
b	Enter the total tax for the tax year determined without regard to the amount entered	١			
	on line 8e	9b	<u> </u>	4	
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making		
D	Election B		ional	9c	
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>
	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
				10b	
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of th		-	۱.,	
	on your tax return. If a loss, go to line 11			10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0	
10	loss on your tax return			12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the Enter the fair market value of the stock on the date of sale or disposition	-		13a	
				13b	
	b Enter the adjusted basis of the stock on the date of sale or disposition  c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your			130	
·				13c	
1 <b>4</b> 2	tax return. If a loss, go to line 14  4a Enter any unreversed inclusions (as defined in section 1296(d))			14a	
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·	
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I				
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c	
	Note: See instructions in case of multiple sales or dispositions.				

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## (Rev. December 2018) Department of the Treasury Internal Revenue Service

## Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Attachment Sequence No. **69** 

Name of shareholder			Identifying number (see instructions)
Nev	v H	ampshire Charitable Foundation	02-6005625
		reet, and room or suite no. If a P.O. box, see instructions. easant Street	Shareholder tax year: calendar year $2023$ or other tax year beginning , and ending ,
City o	r towr	n, state, and ZIP code or country rd, NH 03301-4005	
		of shareholder filing the return: Individual X Corporation Partnershi	p S Corporation Nongrantor Trust Estate
Check	if any	y Excepted Specified Foreign Financial Assets are reported on this form. See instructions	
Qualif	ying l	nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to tr	eat such stock as the stock of a Qualifying
Insura	ance C	Corporation under the alternative facts and circumstances test within the meaning of sectio	n 1297(f)(2). See instructions
		gn corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)	Employer identification number (if any)
		Manager Holdings Singapore	00 1442771
PTI			98-1443771
Addre	ıss (Eı	nter number, street, city or town, and country.)	Reference ID number (see instructions)
9 E	Raf	fles Place, #26-01	Tax year of foreign corporation, PFIC, or QEF: Calendar year 2023
		lic Plaza, Singapore, SINGAPORE 048619	or other tax year beginning , and ending ,
Pa	ırt I	Summary of Annual Information (see instructions)	,
Provid	de the	following information with respect to all shares of the PFIC held by the shareholder:	
1	Desc	cription of each class of shares held by the shareholder: Common Stock	
		Check if shares jointly owned with spouse.	
2	Date	shares acquired during the tax year, if applicable:	
3	Num	ber of shares held at the end of the tax year:	
_			
4	Valu	e of shares held at the end of the tax year (check the appropriate box, if applicable):	
	(a)	X \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000	( <b>d</b> ) \$150,001-200,000
	(e)	If more than \$200,000, list value:	
5	Type	e of PFIC and amount of any excess distribution or gain treated as an excess distribution un	nder section 1291, inclusion under section 1293,
		inclusion or deduction under section 1296 (check all boxes that apply):	
	(a)	Section 1291 \$	
	(b)	Section 1293 (Qualified Electing Fund) \$	g g 1 1 1 10
_	(c)	Section 1296 (Mark to Market) \$	See Statement 19
		Elections (see instructions)	
Α		Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as	
В		Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend t of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you ma 1294(c) and 1294(f) and the related regulations for events that terminate this election.	o calculate the tax that may be deferred.
С		<b>Election To Mark-to-Market PFIC Stock</b> . I, a shareholder of a PFIC, elect to mark-to-mark 1296(e). Complete Part IV.	ket the PFIC stock that is marketable within the meaning of section
D		<b>Deemed Sale Election.</b> I, a shareholder on the first day of a PFIC's first tax year as a QEF	, elect to recognize gain on the deemed sale of my interest in the
E		PFIC. Enter gain or loss on line 15f of Part V.  Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a	QEF that is a controlled foreign corporation (CFC), elect to treat an
		amount equal to my share of the post-1986 earnings and profits of the CFC as an excess excess distribution is greater than zero, also complete line 16 of Part V.	distribution. Enter this amount on line 15e of Part V. If the
F		<b>Election To Recognize Gain on Deemed Sale of PFIC.</b> I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.	
G		Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). E distribution is greater than zero, also complete line 16, Part V.	e) PFIC. My holding period in the stock of the Section 1297(e)
Н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16. Part V	riod in the stock of the former PFIC includes the termination date, as

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making				
	Election B, also complete lines 8a through 9c. See instructions.				
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a			
b	Enter the portion of line 6a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	6b			
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a			
b	Enter the portion of line 7a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	7b			
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun				
	used for your income tax return. See instructions			7c	
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.		
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed				
	or deemed distributed to you during the tax year of the QEF. See instructions	8b			
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c			
d	Add lines 8b and 8c			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,		
	you may make Election B with respect to the amount on line 8e.	1 .	i.		
	Enter the total tax for the tax year. See instructions	9a		4	
b	Enter the total tax for the tax year determined without regard to the amount entered	١			
	on line 8e	9b	<u> </u>	4	
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making		
D	Election B		ional	9c	
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>
	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
				10b	
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of th		-	۱.,	
	on your tax return. If a loss, go to line 11			10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0	
10	loss on your tax return			12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the Enter the fair market value of the stock on the date of sale or disposition	-		13a	
				13b	
	b Enter the adjusted basis of the stock on the date of sale or disposition  c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your			130	
·				13c	
1 <b>4</b> 2	tax return. If a loss, go to line 14  4a Enter any unreversed inclusions (as defined in section 1296(d))			14a	
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·	
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I				
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c	
	Note: See instructions in case of multiple sales or dispositions.				

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## (Rev. December 2018) Department of the Treasury Internal Revenue Service

## Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Attachment Sequence No. **69** 

Name of shareholder			Identifying number (see instructions)
Ne	w H	ampshire Charitable Foundation	02-6005625
	-	reet, and room or suite no. If a P.O. box, see instructions. easant Street	Shareholder tax year: calendar year $2023$ or other tax year beginning , and ending ,
		n, state, and ZIP code or country rd, NH 03301-4005	
		of shareholder filing the return: Individual X Corporation Partnershi	ip S Corporation Nongrantor Trust Estate
Che	ck if any	y Excepted Specified Foreign Financial Assets are reported on this form. See instructions	
		nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to tr	
Insu	rance C	Corporation under the alternative facts and circumstances test within the meaning of sectio	n 1297(f)(2). See instructions
		gn corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)  arbour Investments PTE LTD	Employer identification number (if any)
			98-1497684
Add	ress (Ei	nter number, street, city or town, and country.)	Reference ID number (see instructions)
9	Raf	fles Place, #26-01	Tax year of foreign corporation, PFIC, or QEF: Calendar year 2023
		lic Plaza, Singapore, SINGAPORE 048619	or other tax year beginning , and ending ,
P	art I	Summary of Annual Information (see instructions)	,
Prov	ide the	following information with respect to all shares of the PFIC held by the shareholder:	
1	Desc	cription of each class of shares held by the shareholder: Common Stock	
		Check if shares jointly owned with spouse.	
2	Date	shares acquired during the tax year, if applicable:	
3	Num	ber of shares held at the end of the tax year:	
	Mala		
4		e of shares held at the end of the tax year (check the appropriate box, if applicable):  \$0-50,000 (b) \( \frac{\textbf{X}}{\textbf{X}} \) \$50,001-100,000 (c) \( \frac{\textbf{X}}{\textbf{X}} \) \$100,001-150,000	(d) \$150,001-200,000
	٠,	If more than \$200,000, list value:	(d) 5150,001-200,000
	(6)	πιοτε ιται φ200,000, τει value.	
5	Type	e of PFIC and amount of any excess distribution or gain treated as an excess distribution u	nder section 1291, inclusion under section 1293
		inclusion or deduction under section 1296 (check all boxes that apply):	
	(a)	Section 1291 \$	
	(b)	Section 1293 (Qualified Electing Fund) \$	
	(c)	Section 1296 (Mark to Market) \$	See Statement 20
P	art II	Elections (see instructions)	
Α		Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as	a QEF. Complete lines 6a through 7c of Part III.
В		Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend t of the QEF until this election is terminated. <i>Complete lines 8a through 9c of Part III to</i> Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you ma 1294(c) and 1294(f) and the related regulations for events that terminate this election.	o calculate the tax that may be deferred.
С		<b>Election To Mark-to-Market PFIC Stock</b> . I, a shareholder of a PFIC, elect to mark-to-marl 1296(e). Complete Part IV.	ket the PFIC stock that is marketable within the meaning of section
D		<b>Deemed Sale Election</b> . I, a shareholder on the first day of a PFIC's first tax year as a QEF PFIC. Enter gain or loss on line 15f of Part V.	e, elect to recognize gain on the deemed sale of my interest in the
Ε		<b>Deemed Dividend Election.</b> I, a shareholder on the first day of a PFIC's first tax year as a amount equal to my share of the post-1986 earnings and profits of the CFC as an excess	
		excess distribution is greater than zero, also complete line 16 of Part V.	
F		<b>Election To Recognize Gain on Deemed Sale of PFIC.</b> I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.	
G		Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). E distribution is greater than zero, also complete line 16, Part V.	e) PFIC. My holding period in the stock of the Section 1297(e)
Н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16. Part V	riod in the stock of the former PFIC includes the termination date, as

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making						
	Election B, also complete lines 8a through 9c. See instructions.					
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a				
b	Enter the portion of line 6a that is included in income under section 951 or that may be					
	excluded under section 1293(g)	6b				
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c		
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a				
b	Enter the portion of line 7a that is included in income under section 951 or that may be					
	excluded under section 1293(g)	7b				
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun					
	used for your income tax return. See instructions			7c		
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.			
8 a	Add lines 6c and 7c		 I	8a		
b	Enter the total amount of cash and the fair market value of other property distributed					
	or deemed distributed to you during the tax year of the QEF. See instructions	8b				
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares					
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c				
d	Add lines 8b and 8c			8d		
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e		
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,			
	you may make Election B with respect to the amount on line 8e.	1 .	I			
	Enter the total tax for the tax year. See instructions	9a		_		
b	Enter the total tax for the tax year determined without regard to the amount entered	l				
	on line 8e	9b		_		
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	d by making			
D	Election B		ianal	9c		
	art IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>	
	Enter the fair market value of your PFIC stock at the end of the tax year			10a		
				10b		
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the least set of the last		-	40.		
	on your tax return. If a loss, go to line 11			10c		
	Enter any unreversed inclusions (as defined in section 1296(d))			11		
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			10		
10	loss on your tax return			12		
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the	-		13a		
	Enter the fair market value of the stock on the date of sale or disposition			13b		
	Enter the adjusted basis of the stock on the date of sale or disposition  Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your			100		
·				13c		
142	5 ·			14a		
	a Enter any unreversed inclusions (as defined in section 1296(d)) b Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Include this amount as an ordinary			- ""		
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, complete line 14c			14b		
C	c Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. Include this amount on your tax					
	return according to the rules generally applicable for losses provided elsewhere in the Code and regulations			14c		
	Note: See instructions in case of multiple sales or dispositions.					

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

# Form **8621**(Rev. December 2018) Department of the Treasury Internal Revenue Service

### Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Attachment Sequence No. **69** 

Name of shareholder			Identifying number (see instructions)			
Ne	w H	ampshire Charitable Foundation	02-6005625			
Num	ber, str	reet, and room or suite no. If a P.O. box, see instructions.  easant Street	Shareholder tax year: calendar year 2023 or other tax year beginning , and ending ,			
		n, state, and ZIP code or country rd, NH 03301–4005				
		of shareholder filing the return: Individual X Corporation Partnershi	p S Corporation Nongrantor Trust Estate			
		/ Excepted Specified Foreign Financial Assets are reported on this form. See instructions .				
		nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to tr				
		Corporation under the alternative facts and circumstances test within the meaning of sectio				
		gn corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)  erde XI Investments PTE LTD	Employer identification number (if any)			
			98-1502538			
	•	nter number, street, city or town, and country.)	Reference ID number (see instructions)			
9 Raffles Place, #26-01 Republic Plaza, Singapore, SINGAPORE 048624			Tax year of foreign corporation, PFIC, or QEF: Calendar year $2023$ or other tax year beginning			
D	art I	Summary of Annual Information (see instructions)	and ending , .			
		following information with respect to all shares of the PFIC held by the shareholder:				
1		ription of each class of shares held by the shareholder: Common Stock				
•		Check if shares jointly owned with spouse.				
2	Date	shares acquired during the tax year, if applicable:				
3	Num	ber of shares held at the end of the tax year:				
4	Valu	e of shares held at the end of the tax year (check the appropriate box, if applicable):				
7		\$0-50,000 <b>(b)</b> \$50,001-100,000 <b>(c)</b> \$100,001-150,000	(d) X \$150,001-200,000			
	` '	If more than \$200,000, list value:	(u) ==			
	(-)					
5	Type	of PFIC and amount of any excess distribution or gain treated as an excess distribution ur	nder section 1291, inclusion under section 1293,			
	and i	inclusion or deduction under section 1296 (check all boxes that apply):				
	(a)	Section 1291 \$				
	(b)	Section 1293 (Qualified Electing Fund) \$				
	(c)	Section 1296 (Mark to Market) \$	See Statement 21			
Р	art II					
Α	Щ	<b>Election To Treat the PFIC as a QEF.</b> I, a shareholder of a PFIC, elect to treat the PFIC as	•			
В		Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may 1294(c) and 1294(f) and the related regulations for events that terminate this election.	o calculate the tax that may be deferred.			
С		<b>Election To Mark-to-Market PFIC Stock</b> . I, a shareholder of a PFIC, elect to mark-to-mark 1296(e). <i>Complete Part IV</i> .	xet the PFIC stock that is marketable within the meaning of section			
D		<b>Deemed Sale Election.</b> I, a shareholder on the first day of a PFIC's first tax year as a QEF PFIC. Enter gain or loss on line 15f of Part V.	, elect to recognize gain on the deemed sale of my interest in the			
E		<b>Deemed Dividend Election.</b> I, a shareholder on the first day of a PFIC's first tax year as a amount equal to my share of the post-1986 earnings and profits of the CFC as an excess				
		excess distribution is greater than zero, also complete line 16 of Part V.				
F		<b>Election To Recognize Gain on Deemed Sale of PFIC.</b> I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.				
G		Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Edistribution is greater than zero, also complete line 16, Part V.	) PFIC. My holding period in the stock of the Section 1297(e)			
Н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16. Part V	iod in the stock of the former PFIC includes the termination date, as			

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making						
	Election B, also complete lines 8a through 9c. See instructions.					
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a				
b	Enter the portion of line 6a that is included in income under section 951 or that may be					
	excluded under section 1293(g)	6b				
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c		
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a				
b	Enter the portion of line 7a that is included in income under section 951 or that may be					
	excluded under section 1293(g)	7b				
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun					
	used for your income tax return. See instructions			7c		
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.			
8 a	Add lines 6c and 7c		 I	8a		
b	Enter the total amount of cash and the fair market value of other property distributed					
	or deemed distributed to you during the tax year of the QEF. See instructions	8b				
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares					
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c				
d	Add lines 8b and 8c			8d		
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e		
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,			
	you may make Election B with respect to the amount on line 8e.	1 .	I			
	Enter the total tax for the tax year. See instructions	9a		_		
b	Enter the total tax for the tax year determined without regard to the amount entered	l				
	on line 8e	9b		_		
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	d by making			
D	Election B		ianal	9c		
	art IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>	
	Enter the fair market value of your PFIC stock at the end of the tax year			10a		
				10b		
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the least set of the last		-	40.		
	on your tax return. If a loss, go to line 11			10c		
	Enter any unreversed inclusions (as defined in section 1296(d))			11		
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			10		
10	loss on your tax return			12		
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the	-		13a		
	Enter the fair market value of the stock on the date of sale or disposition			13b		
	Enter the adjusted basis of the stock on the date of sale or disposition  Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your			100		
·				13c		
142	5 ·			14a		
	a Enter any unreversed inclusions (as defined in section 1296(d)) b Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Include this amount as an ordinary			- ""		
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, complete line 14c			14b		
C	c Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. Include this amount on your tax					
	return according to the rules generally applicable for losses provided elsewhere in the Code and regulations			14c		
	Note: See instructions in case of multiple sales or dispositions.					

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

### Information Return by a Shareholder of a Passive Foreign **Investment Company or Qualified Electing Fund**

OMB No. 1545-1002

Attachment ► Go to www.irs.gov/Form8621 for instructions and the latest information. Sequence No. 69 **Identifying number** (see instructions) Name of shareholder New Hampshire Charitable Foundation 02-6005625 Number, street, and room or suite no. If a P.O. box, see instructions. Shareholder tax year: calendar year 2023 or other tax year beginning 37 Pleasant Street and ending City or town, state, and ZIP code or country 03301-4005 Concord, NH Check type of shareholder filing the return: Individual X Corporation Partnership S Corporation Nongrantor Trust Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) Employer identification number (if any) OCM Castle XI Investments PTE LTD 98-1576736 Address (Enter number, street, city or town, and country.) Reference ID number (see instructions) 80 Raffles Place #51-03 Tax year of foreign corporation, PFIC, or QEF: Calendar year  $\overline{2023}$ Republic Plaza, Singapore, SINGAPORE 048624 or other tax year beginning and ending Summary of Annual Information (see instructions) Provide the following information with respect to all shares of the PFIC held by the shareholder: Description of each class of shares held by the shareholder: Common Stock Check if shares jointly owned with spouse. Date shares acquired during the tax year, if applicable: Number of shares held at the end of the tax year: Value of shares held at the end of the tax year (check the appropriate box, if applicable): (b) X \$50.001-100.000 (c) \$100.001-150.000 \$150.001-200.000 (e) If more than \$200,000, list value: Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply): Section 1291 \$ Section 1293 (Qualified Electing Fund) \$ (b) See Statement 22 (c) L Section 1296 (Mark to Market) \$ Part II Elections (see instructions) Lection To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III. Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.

Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections В 1294(c) and 1294(f) and the related regulations for events that terminate this election. Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e), Complete Part IV. Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line 15f of Part V. Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an Εl amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part V. Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line 15f of Part V. Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V. Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also

complete line 16. Part V.

Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making						
	Election B, also complete lines 8a through 9c. See instructions.					
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a				
b	Enter the portion of line 6a that is included in income under section 951 or that may be					
	excluded under section 1293(g)	6b				
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c		
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a				
b	Enter the portion of line 7a that is included in income under section 951 or that may be					
	excluded under section 1293(g)	7b				
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun					
	used for your income tax return. See instructions			7c		
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.			
8 a	Add lines 6c and 7c		 I	8a		
b	Enter the total amount of cash and the fair market value of other property distributed					
	or deemed distributed to you during the tax year of the QEF. See instructions	8b				
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares					
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c				
d	Add lines 8b and 8c			8d		
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e		
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,			
	you may make Election B with respect to the amount on line 8e.	1 .	I			
	Enter the total tax for the tax year. See instructions	9a		_		
b	Enter the total tax for the tax year determined without regard to the amount entered	l				
	on line 8e	9b		_		
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	d by making			
D	Election B		ianal	9c		
	art IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>	
	Enter the fair market value of your PFIC stock at the end of the tax year			10a		
				10b		
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last section 11 and 12. Include this amount of the last section 11 and 12 and 12 and 13 and 14 and 14 and 15 and 16		-	40.		
	on your tax return. If a loss, go to line 11			10c		
	Enter any unreversed inclusions (as defined in section 1296(d))			11		
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			10		
10	loss on your tax return			12		
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the	-		13a		
	Enter the fair market value of the stock on the date of sale or disposition			13b		
	Enter the adjusted basis of the stock on the date of sale or disposition  Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your			100		
·				13c		
142	5 ·			14a		
	a Enter any unreversed inclusions (as defined in section 1296(d)) b Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Include this amount as an ordinary			- ""		
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, complete line 14c			14b		
C	c Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. Include this amount on your tax					
	return according to the rules generally applicable for losses provided elsewhere in the Code and regulations			14c		
	Note: See instructions in case of multiple sales or dispositions.					

#### Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Part V Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Name of shareholder			Identifying number (see instructions)		
Ne	w H	ampshire Charitable Foundation	02-6005625		
Nun	nber, st	reet, and room or suite no. If a P.O. box, see instructions.	Shareholder tax year: calendar year $2023$ or other tax year beginning		
<u>37</u>	P1	easant Street	, and ending , .		
		n, state, and ZIP code or country rd, NH 03301-4005			
Che	ck type	of shareholder filing the return: Individual X Corporation Partnershi	p S Corporation Nongrantor Trust Estate		
		y Excepted Specified Foreign Financial Assets are reported on this form. See instructions .			
		nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to tr			
		Corporation under the alternative facts and circumstances test within the meaning of sectio			
		gn corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)  XI Investments PTE	Employer identification number (if any)		
			98-1553650		
Add	ress (Ei	nter number, street, city or town, and country.)	Reference ID number (see instructions)		
80	Ra	ffles Place #51-03	Tax year of foreign corporation, PFIC, or QEF: Calendar year 2023		
Re	pub	lic Plaza, Singapore, SINGAPORE 048624	or other tax year beginning , and ending , .		
P	art I	Summary of Annual Information (see instructions)	,		
Prov	/ide the	following information with respect to all shares of the PFIC held by the shareholder:			
1	Desc	cription of each class of shares held by the shareholder: Common Stock			
		Check if shares jointly owned with spouse.			
2	Date	shares acquired during the tax year, if applicable:			
3	Num	ber of shares held at the end of the tax year:			
4		e of shares held at the end of the tax year (check the appropriate box, if applicable):	(4)		
	(a)	_ , , , , , , , , , , , , , , , , , , ,	(d) \$150,001-200,000		
	(6)	If more than \$200,000, list value: 205,021.			
5	Type	e of PFIC and amount of any excess distribution or gain treated as an excess distribution ur	nder section 1291, inclusion under section 1293		
•		inclusion or deduction under section 1296 (check all boxes that apply):			
	(a)	Section 1291 \$			
	(b)	Section 1293 (Qualified Electing Fund) \$			
	(c)	Section 1296 (Mark to Market) \$	See Statement 23		
P	art II				
Α	Щ	<b>Election To Treat the PFIC as a QEF.</b> I, a shareholder of a PFIC, elect to treat the PFIC as	•		
В		election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may 1294(c) and 1294(f) and the related regulations for events that terminate this election.	o calculate the tax that may be deferred.		
С		<b>Election To Mark-to-Market PFIC Stock</b> . I, a shareholder of a PFIC, elect to mark-to-mark 1296(e). <i>Complete Part IV</i> .	xet the PFIC stock that is marketable within the meaning of section		
D		<b>Deemed Sale Election</b> . I, a shareholder on the first day of a PFIC's first tax year as a QEF PFIC. Enter gain or loss on line 15f of Part V.	, elect to recognize gain on the deemed sale of my interest in the		
Ε		Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a			
		amount equal to my share of the post-1986 earnings and profits of the CFC as an excess excess distribution is greater than zero, also complete line 16 of Part V.	distribution. Enter this amount on line 15e of Part V. If the		
F		<b>Election To Recognize Gain on Deemed Sale of PFIC.</b> I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last $gain\ on\ line\ 15f\ of\ Part\ V.$			
G		Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). E distribution is greater than zero, also complete line 16, Part V.	) PFIC. My holding period in the stock of the Section 1297(e)		
Н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16, Part V.	iod in the stock of the former PFIC includes the termination date, as		

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making				
	Election B, also complete lines 8a through 9c. See instructions.				
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a			
b	Enter the portion of line 6a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	6b			
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a			
b	Enter the portion of line 7a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	7b			
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun				
	used for your income tax return. See instructions			7c	
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.		
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed				
	or deemed distributed to you during the tax year of the QEF. See instructions	8b			
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c			
d	Add lines 8b and 8c			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,		
	you may make Election B with respect to the amount on line 8e.	1 .	i.		
	Enter the total tax for the tax year. See instructions	9a		4	
b	Enter the total tax for the tax year determined without regard to the amount entered	١			
	on line 8e	9b	<u> </u>	4	
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making		
D	Election B		ional	9c	
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>
	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
				10b	
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of the last restriction of the last restriction of the last restriction.		-	۱.,	
	on your tax return. If a loss, go to line 11			10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0	
10	loss on your tax return			12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the	-		13a	
	<ul><li>a Enter the fair market value of the stock on the date of sale or disposition</li><li>b Enter the adjusted basis of the stock on the date of sale or disposition</li></ul>			13b	
			income on your	130	
·	c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your tax return. If a loss, go to line 14			13c	
1 <b>4</b> 2	- · · · · · · · · · · · · · · · · · · ·			14a	
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·	
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I				
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c	
	Note: See instructions in case of multiple sales or dispositions.				

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Name of shareholder			Identifying number (see instructions)		
Ne	w H	ampshire Charitable Foundation	02-6005625		
		reet, and room or suite no. If a P.O. box, see instructions.	Shareholder tax year: calendar year 2023 or other tax year beginning		
37	P1	easant Street	, and ending , .		
		n, state, and ZIP code or country rd, NH 03301–4005			
		of shareholder filing the return: Individual X Corporation Partnershi	p S Corporation Nongrantor Trust Estate		
Che	ck if any	y Excepted Specified Foreign Financial Assets are reported on this form. See instructions .			
		nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to tr			
		Corporation under the alternative facts and circumstances test within the meaning of section			
		gn corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)  errero Investments PTE LTD	Employer identification number (if any)		
			98-1501977		
Add	ress (Ei	nter number, street, city or town, and country.)	Reference ID number (see instructions)		
9	Raf	fles Place, #26-01	Tax year of foreign corporation, PFIC, or QEF: Calendar year 2023		
Re	pub	lic Plaza, Singapore, SINGAPORE 048619	or other tax year beginning , and ending , .		
P	art I	Summary of Annual Information (see instructions)	,		
Prov		following information with respect to all shares of the PFIC held by the shareholder:			
1	Desc	cription of each class of shares held by the shareholder: Common Stock			
		Check if shares jointly owned with spouse.			
2	Date	shares acquired during the tax year, if applicable:			
3	Num	ber of shares held at the end of the tax year:			
4	(a)	e of shares held at the end of the tax year (check the appropriate box, if applicable): $\mathbb{X}$ \$50,001-100,000 (c) $\mathbb{X}$ \$100,001-150,000	(d) \$150,001-200,000		
	` '		(a) \$150,001-200,000		
	(0)	11 more than \$200,000, not value.			
5	Type	e of PFIC and amount of any excess distribution or gain treated as an excess distribution ur	nder section 1291, inclusion under section 1293.		
		inclusion or deduction under section 1296 (check all boxes that apply):	,		
	(a)	Section 1291 \$			
	(b)	Section 1293 (Qualified Electing Fund) \$			
	(c)	Section 1296 (Mark to Market) \$	See Statement 24		
Р	art II				
Α		Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as	•		
В		election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend to of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you ma 1294(c) and 1294(f) and the related regulations for events that terminate this election.	o calculate the tax that may be deferred.		
С		<b>Election To Mark-to-Market PFIC Stock</b> . I, a shareholder of a PFIC, elect to mark-to-mark 1296(e). <i>Complete Part IV</i> .	xet the PFIC stock that is marketable within the meaning of section		
D		<b>Deemed Sale Election</b> . I, a shareholder on the first day of a PFIC's first tax year as a QEF PFIC. Enter gain or loss on line 15f of Part V.	, elect to recognize gain on the deemed sale of my interest in the		
E		Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a			
		amount equal to my share of the post-1986 earnings and profits of the CFC as an excess excess distribution is greater than zero, also complete line 16 of Part V.	distribution. Enter this amount on line 15e of Part V. If the		
F		<b>Election To Recognize Gain on Deemed Sale of PFIC.</b> I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last <i>gain on line 15f of Part V.</i>			
G		Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Edistribution is greater than zero, also complete line 16, Part V.	) PFIC. My holding period in the stock of the Section 1297(e)		
Н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16, Part V.	iod in the stock of the former PFIC includes the termination date, as		

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making				
	Election B, also complete lines 8a through 9c. See instructions.				
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a			
b	Enter the portion of line 6a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	6b			
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a			
b	Enter the portion of line 7a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	7b			
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun				
	used for your income tax return. See instructions			7c	
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.		
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed				
	or deemed distributed to you during the tax year of the QEF. See instructions	8b			
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c			
d	Add lines 8b and 8c			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,		
	you may make Election B with respect to the amount on line 8e.	1 .	i.		
	Enter the total tax for the tax year. See instructions	9a		4	
b	Enter the total tax for the tax year determined without regard to the amount entered	١			
	on line 8e	9b	<u> </u>	4	
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making		
D	Election B		ional	9c	
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>
	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
				10b	
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of the last restriction of the last restriction of the last restriction.		-	۱.,	
	on your tax return. If a loss, go to line 11			10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0	
10	loss on your tax return			12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the	-		13a	
	<ul><li>a Enter the fair market value of the stock on the date of sale or disposition</li><li>b Enter the adjusted basis of the stock on the date of sale or disposition</li></ul>			13b	
			income on your	130	
·	c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your tax return. If a loss, go to line 14			13c	
1 <b>4</b> 2	- · · · · · · · · · · · · · · · · · · ·			14a	
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·	
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I				
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c	
	Note: See instructions in case of multiple sales or dispositions.				

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Nam	ne of sh	areholder	Identifying number (see instructions)
Ne	w H	ampshire Charitable Foundation	02-6005625
		reet, and room or suite no. If a P.O. box, see instructions.	Shareholder tax year: calendar year 2023 or other tax year beginning
37	P1	easant Street	, and ending , .
		n, state, and ZIP code or country rd, NH 03301–4005	
		of shareholder filing the return: Individual X Corporation Partnershi	p S Corporation Nongrantor Trust Estate
Che	ck if any	y Excepted Specified Foreign Financial Assets are reported on this form. See instructions .	
		nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to tr	
		Corporation under the alternative facts and circumstances test within the meaning of section	
		gn corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) hina Direct Access 1 PTE LTD	Employer identification number (if any)
			98-1461028
Add	ress (Ei	nter number, street, city or town, and country.)	Reference ID number (see instructions)
9	Raf	fles Place, #26-01	Tax year of foreign corporation, PFIC, or QEF: Calendar year 2023
Re	pub	lic Plaza, Singapore, SINGAPORE 048619	or other tax year beginning , and ending , .
Р	art I	Summary of Annual Information (see instructions)	,
Prov		following information with respect to all shares of the PFIC held by the shareholder:	
1	Desc	cription of each class of shares held by the shareholder: Common Stock	
		Check if shares jointly owned with spouse.	
2	Date	shares acquired during the tax year, if applicable:	
3	Num	ber of shares held at the end of the tax year:	
	Valu		
4		e of shares held at the end of the tax year (check the appropriate box, if applicable): $X$ \$0-50,000 (b) $S$ 50,001-100,000 (c) $S$ 100,001-150,000	(d) \$150,001-200,000
	٠,	If more than \$200,000, list value:	(u) \$130,001-200,000
	(-)		
5	Туре	e of PFIC and amount of any excess distribution or gain treated as an excess distribution ur	nder section 1291, inclusion under section 1293,
	and	inclusion or deduction under section 1296 (check all boxes that apply):	
	(a)	Section 1291 \$	
	(b)	Section 1293 (Qualified Electing Fund) \$	g g 05
_	(c)	Section 1296 (Mark to Market) \$	See Statement 25
_	art II	Elections (see instructions)  Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as	-055.0
A B		Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you ma	he time for payment of tax on the undistributed earnings and profits o calculate the tax that may be deferred.
_		1294(c) and 1294(f) and the related regulations for events that terminate this election.	
С		<b>Election To Mark-to-Market PFIC Stock.</b> I, a shareholder of a PFIC, elect to mark-to-mark 1296(e). <i>Complete Part IV.</i>	ket the PFIC stock that is marketable within the meaning of section
D		<b>Deemed Sale Election.</b> I, a shareholder on the first day of a PFIC's first tax year as a QEF PFIC. Enter gain or loss on line 15f of Part V.	, elect to recognize gain on the deemed sale of my interest in the
E		<b>Deemed Dividend Election.</b> I, a shareholder on the first day of a PFIC's first tax year as a amount equal to my share of the post-1986 earnings and profits of the CFC as an excess	
		excess distribution is greater than zero, also complete line 16 of Part V.	
F		<b>Election To Recognize Gain on Deemed Sale of PFIC.</b> I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.	
G		<b>Deemed Dividend Election With Respect to a Section 1297(e) PFIC.</b> I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Editable to the Section 1.1297-3(d). Editable to the Section 1.1297-3(d) and the Section 1.1297-3(d) and the Section 1.1297-3(d).	e) PFIC. My holding period in the stock of the Section 1297(e)
н		distribution is greater than zero, also complete line 16, Part V.  Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16, Part V.	riod in the stock of the former PFIC includes the termination date, as

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making				
	Election B, also complete lines 8a through 9c. See instructions.				
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a			
b	Enter the portion of line 6a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	6b			
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a			
b	Enter the portion of line 7a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	7b			
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun				
	used for your income tax return. See instructions			7c	
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.		
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed				
	or deemed distributed to you during the tax year of the QEF. See instructions	8b			
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c			
d	Add lines 8b and 8c			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,		
	you may make Election B with respect to the amount on line 8e.	1 .	i.		
	Enter the total tax for the tax year. See instructions	9a		4	
b	Enter the total tax for the tax year determined without regard to the amount entered	١			
	on line 8e	9b	<u> </u>	4	
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making		
D	Election B		ional	9c	
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>
	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
				10b	
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of the last restriction of the last restriction of the last restriction.		-	۱.,	
	on your tax return. If a loss, go to line 11			10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0	
10	loss on your tax return			12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the	-		13a	
	<ul><li>a Enter the fair market value of the stock on the date of sale or disposition</li><li>b Enter the adjusted basis of the stock on the date of sale or disposition</li></ul>			13b	
			income on your	130	
·	c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your tax return. If a loss, go to line 14			13c	
1 <b>4</b> 2	- · · · · · · · · · · · · · · · · · · ·			14a	
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·	
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I				
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c	
	Note: See instructions in case of multiple sales or dispositions.				

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

### Information Return by a Shareholder of a Passive Foreign **Investment Company or Qualified Electing Fund**

OMB No. 1545-1002

Attachment ► Go to www.irs.gov/Form8621 for instructions and the latest information. Sequence No. 69 **Identifying number** (see instructions) Name of shareholder New Hampshire Charitable Foundation 02-6005625 Number, street, and room or suite no. If a P.O. box, see instructions. Shareholder tax year: calendar year 2023 or other tax year beginning 37 Pleasant Street and ending City or town, state, and ZIP code or country 03301-4005 Concord, NH Check type of shareholder filing the return: Individual X Corporation Partnership S Corporation Nongrantor Trust Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions ... Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) Employer identification number (if any) OCM Lee Topco SARL 98-1452445 Address (Enter number, street, city or town, and country.) Reference ID number (see instructions) 26A Boulevard Royal Tax year of foreign corporation, PFIC, or QEF: Calendar year  $\overline{2023}$ Luxembourg, LUXEMBOURG L-2449 or other tax year beginning and ending Summary of Annual Information (see instructions) Provide the following information with respect to all shares of the PFIC held by the shareholder: Description of each class of shares held by the shareholder: Common Stock Check if shares jointly owned with spouse. Date shares acquired during the tax year, if applicable: Number of shares held at the end of the tax year: Value of shares held at the end of the tax year (check the appropriate box, if applicable): **(b)** \$50,001-100.000 (a) X \$0-50.000 (c) \$100.001-150.000 \$150.001-200.000 (e) If more than \$200,000, list value: Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply): Section 1291 \$ Section 1293 (Qualified Electing Fund) \$ (b) See Statement 26 (c) L Section 1296 (Mark to Market) \$ Part II Elections (see instructions) Lection To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III. Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.

Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections В 1294(c) and 1294(f) and the related regulations for events that terminate this election. Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e), Complete Part IV. Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line 15f of Part V. Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an Εl amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part V. Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line 15f of Part V. Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V. Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as

defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also

complete line 16. Part V.

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making				
	Election B, also complete lines 8a through 9c. See instructions.				
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a			
b	Enter the portion of line 6a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	6b			
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a			
b	Enter the portion of line 7a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	7b			
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun				
	used for your income tax return. See instructions			7c	
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.		
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed				
	or deemed distributed to you during the tax year of the QEF. See instructions	8b			
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c			
d	Add lines 8b and 8c			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,		
	you may make Election B with respect to the amount on line 8e.	1 .	i.		
	Enter the total tax for the tax year. See instructions	9a		4	
b	Enter the total tax for the tax year determined without regard to the amount entered	١			
	on line 8e	9b	<u> </u>	4	
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making		
D	Election B		ional	9c	
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>
	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
				10b	
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of the last restriction of the last restriction of the last restriction.		-	۱.,	
	on your tax return. If a loss, go to line 11			10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0	
10	loss on your tax return			12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the	-		13a	
	<ul><li>a Enter the fair market value of the stock on the date of sale or disposition</li><li>b Enter the adjusted basis of the stock on the date of sale or disposition</li></ul>			13b	
			income on your	130	
·	c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your tax return. If a loss, go to line 14			13c	
1 <b>4</b> 2	- · · · · · · · · · · · · · · · · · · ·			14a	
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·	
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I				
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c	
	Note: See instructions in case of multiple sales or dispositions.				

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Nan	ne of sh	areholder	Identifying number (see instructions)			
Ne	w H	ampshire Charitable Foundation	02-6005625			
		reet, and room or suite no. If a P.O. box, see instructions.	Shareholder tax year: calendar year 2023 or other tax year beginning			
37	Р1	easant Street	, and ending ,			
		n, state, and ZIP code or country rd, NH 03301-4005				
		of shareholder filing the return: Individual X Corporation Partnershi	ip S Corporation Nongrantor Trust Estate			
Che	ck if any	y Excepted Specified Foreign Financial Assets are reported on this form. See instructions .	·			
Qua	lifying I	nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to tr	eat such stock as the stock of a Qualifying			
Insu	rance (	Corporation under the alternative facts and circumstances test within the meaning of sectio	n 1297(f)(2). See instructions			
		gn corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)	Employer identification number (if any)			
		irius Aviation Opportunities	00.144000			
	RL		98-1442209			
Add	ress (Ei	nter number, street, city or town, and country.)	Reference ID number (see instructions)			
26	АВ	oulevard Royal	Tax year of foreign corporation, PFIC, or QEF: Calendar year 2023			
		bourg, LUXEMBOURG L-2449	or other tax year beginning ,			
			and ending , .			
P	art I	Summary of Annual Information (see instructions)				
Prov	/ide the	following information with respect to all shares of the PFIC held by the shareholder:				
1	Desc	cription of each class of shares held by the shareholder: Common Stock				
		Check if shares jointly owned with spouse.				
2	Date	shares acquired during the tax year, if applicable:				
3	Num	ber of shares held at the end of the tax year:				
	Valu					
4		e of shares held at the end of the tax year (check the appropriate box, if applicable): $X$ \$0-50,000 (b) $S$ 50,001-100,000 (c) $S$ 100,001-150,000	(d) \$150,001-200,000			
	٠,		(d) \$150,001-200,000			
	(e)	If more than \$200,000, list value:				
5	Type	e of PFIC and amount of any excess distribution or gain treated as an excess distribution u	nder section 1201, inclusion under section 1202			
J		inclusion or deduction under section 1296 (check all boxes that apply):	idel section 1231, inclusion under section 1233,			
	(a)	Section 1291 \$				
	(b)	Section 1293 (Qualified Electing Fund) \$				
	(c)	Section 1296 (Mark to Market) \$	See Statement 27			
P	art II					
Ā		<b>Election To Treat the PFIC as a QEF. I</b> , a shareholder of a PFIC, elect to treat the PFIC as	a QEF. Complete lines 6a through 7c of Part III.			
В		Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend t of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you ma 1294(c) and 1294(f) and the related regulations for events that terminate this election.	he time for payment of tax on the undistributed earnings and profits o calculate the tax that may be deferred.			
С		Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-mark 1296(e). Complete Part IV.	ket the PFIC stock that is marketable within the meaning of section			
D		<b>Deemed Sale Election.</b> I, a shareholder on the first day of a PFIC's first tax year as a QEF	, elect to recognize gain on the deemed sale of my interest in the			
		PFIC. Enter gain or loss on line 15f of Part V.				
Ε		<b>Deemed Dividend Election.</b> I, a shareholder on the first day of a PFIC's first tax year as a amount equal to my share of the post-1986 earnings and profits of the CFC as an excess				
		excess distribution is greater than zero, also complete line 16 of Part V.				
F		<b>Election To Recognize Gain on Deemed Sale of PFIC.</b> I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.				
G		Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Expect the property line 16. Part V.	e) PFIC. My holding period in the stock of the Section 1297(e)			
Н	distribution is greater than zero, also complete line 16, Part V.  Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.					

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making				
	Election B, also complete lines 8a through 9c. See instructions.				
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a			
b	Enter the portion of line 6a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	6b			
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a			
b	Enter the portion of line 7a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	7b			
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun				
	used for your income tax return. See instructions			7c	
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.		
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed				
	or deemed distributed to you during the tax year of the QEF. See instructions	8b			
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c			
d	Add lines 8b and 8c			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,		
	you may make Election B with respect to the amount on line 8e.	1 .	i.		
	Enter the total tax for the tax year. See instructions	9a		4	
b	Enter the total tax for the tax year determined without regard to the amount entered	١			
	on line 8e	9b	<u> </u>	4	
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making		
D	Election B		ional	9c	
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>
	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
				10b	
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of the last restriction of the last restriction of the last restriction.		-	۱.,	
	on your tax return. If a loss, go to line 11			10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0	
10	loss on your tax return			12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the	-		13a	
	<ul><li>a Enter the fair market value of the stock on the date of sale or disposition</li><li>b Enter the adjusted basis of the stock on the date of sale or disposition</li></ul>			13b	
			income on your	130	
·	c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your tax return. If a loss, go to line 14			13c	
1 <b>4</b> 2	- · · · · · · · · · · · · · · · · · · ·			14a	
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·	
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I				
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c	
	Note: See instructions in case of multiple sales or dispositions.				

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Name of	shareholder	Identifying number (see instructions)				
New	Hampshire Charitable Foundation	02-6005625				
	street, and room or suite no. If a P.O. box, see instructions.	Shareholder tax year: calendar year 2023 or other tax year beginning , and ending ,				
	own, state, and ZIP code or country					
	pe of shareholder filing the return: Individual X Corporation Partnersh	ip S Corporation Nongrantor Trust Estate				
Check if	any Excepted Specified Foreign Financial Assets are reported on this form. See instructions					
	g Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to t					
Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions						
ITA	oreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)  Hotel Investments Holdco 1	Employer identification number (if any)				
SARI		98-1480147				
Address	(Enter number, street, city or town, and country.)	Reference ID number (see instructions)				
Luxe	Boulevard Royal embourg, LUXEMBOURG L-2449	Tax year of foreign corporation, PFIC, or QEF: Calendar year 2 0 2 3 or other tax year beginning , and ending , .				
Part	(======)					
	the following information with respect to all shares of the PFIC held by the shareholder: escription of each class of shares held by the shareholder: Common Stock					
	Check if shares jointly owned with spouse.					
<b>2</b> D	ate shares acquired during the tax year, if applicable:					
3 N	umber of shares held at the end of the tax year:					
4 \/	alue of shares held at the end of the tax year (check the appropriate box, if applicable):					
	a) X \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000	(d) \$150,001-200,000				
•	e) If more than \$200,000, list value:	(u)				
,						
5 T	ype of PFIC and amount of any excess distribution or gain treated as an excess distribution u	nder section 1291, inclusion under section 1293,				
a	nd inclusion or deduction under section 1296 (check all boxes that apply):					
(;	a) Section 1291 \$					
(1	Section 1293 (Qualified Electing Fund) \$					
	s) Section 1296 (Mark to Market) \$	See Statement 28				
Part	Elections (see instructions)					
A	Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as	· · · · · ·				
В∟	Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may 1294(c) and 1294(f) and the related regulations for events that terminate this election.	o calculate the tax that may be deferred.				
С	Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-mar 1296(e). Complete Part IV.	ket the PFIC stock that is marketable within the meaning of section				
D [	Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEI PFIC. Enter gain or loss on line 15f of Part V.	F, elect to recognize gain on the deemed sale of my interest in the				
E	Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a amount equal to my share of the post-1986 earnings and profits of the CFC as an excess excess distribution is greater than zero, also complete line 16 of Part V.	• • • • • • • • • • • • • • • • • • • •				
F	Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.					
G □	Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297( PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Idistribution is greater than zero, also complete line 16, Part V.	e) PFIC. My holding period in the stock of the Section 1297(e)				
н 🗆	Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding pedefined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 complete line 16. Part V	riod in the stock of the former PFIC includes the termination date, as				

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making				
	Election B, also complete lines 8a through 9c. See instructions.				
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a			
b	Enter the portion of line 6a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	6b			
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a			
b	Enter the portion of line 7a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	7b			
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun				
	used for your income tax return. See instructions			7c	
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.		
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed				
	or deemed distributed to you during the tax year of the QEF. See instructions	8b			
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c			
d	Add lines 8b and 8c			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,		
	you may make Election B with respect to the amount on line 8e.	1 .	i.		
	Enter the total tax for the tax year. See instructions	9a		4	
b	Enter the total tax for the tax year determined without regard to the amount entered	١			
	on line 8e	9b	<u> </u>	4	
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making		
D	Election B		ional	9c	
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>
	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
				10b	
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of the last restriction of the last restriction of the last restriction.		-	۱.,	
	on your tax return. If a loss, go to line 11			10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0	
10	loss on your tax return			12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the	-		13a	
	<ul><li>a Enter the fair market value of the stock on the date of sale or disposition</li><li>b Enter the adjusted basis of the stock on the date of sale or disposition</li></ul>			13b	
			income on your	130	
·	c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your tax return. If a loss, go to line 14			13c	
1 <b>4</b> 2	- · · · · · · · · · · · · · · · · · · ·			14a	
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·	
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I				
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c	
	Note: See instructions in case of multiple sales or dispositions.				

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Name of	shareholder	Identifying number (see instructions)				
New	Hampshire Charitable Foundation	02-6005625				
	street, and room or suite no. If a P.O. box, see instructions.	Shareholder tax year: calendar year 2023 or other tax year beginning , and ending ,				
	own, state, and ZIP code or country					
	pe of shareholder filing the return: Individual X Corporation Partnersh	ip S Corporation Nongrantor Trust Estate				
Check if	any Excepted Specified Foreign Financial Assets are reported on this form. See instructions					
-	g Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to t					
Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions						
ITA	oreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)  Hotel Investments (Arsenale)	Employer identification number (if any)				
SARI		98-1641483				
Address	(Enter number, street, city or town, and country.)	Reference ID number (see instructions)				
Luxe	Boulevard Royal embourg, LUXEMBOURG L-2449	Tax year of foreign corporation, PFIC, or QEF: Calendar year $2023$ or other tax year beginning , and ending , .				
Part	(======================================					
	the following information with respect to all shares of the PFIC held by the shareholder: escription of each class of shares held by the shareholder:  Common Stock					
լ <b>2</b> D	Check if shares jointly owned with spouse. ate shares acquired during the tax year, if applicable:					
	ate shares acquired during the tax year, it applicable.					
3 N	umber of shares held at the end of the tax year:					
(;	alue of shares held at the end of the tax year (check the appropriate box, if applicable):  a) $X$ \$0-50,000 (b) $x$ \$50,001-100,000 (c) \$100,001-150,000	(d) \$150,001-200,000				
()	e) If more than \$200,000, list value:					
<b>5</b> T	ype of PFIC and amount of any excess distribution or gain treated as an excess distribution u	nder section 1291, inclusion under section 1293,				
a	nd inclusion or deduction under section 1296 (check all boxes that apply):					
(;	a) Section 1291 \$					
•	Section 1293 (Qualified Electing Fund) \$	· · · · · · · · · · · · · · · · ·				
	Section 1296 (Mark to Market) \$	See Statement 29				
	Elections (see instructions)					
A	Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as  Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend to the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may 1294(c) and 1294(f) and the related regulations for events that terminate this election.	the time for payment of tax on the undistributed earnings and profits o calculate the tax that may be deferred.				
c [	Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-mar 1296(e). Complete Part IV.	ket the PFIC stock that is marketable within the meaning of section				
<b>D</b>	Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEI PFIC. Enter gain or loss on line 15f of Part V.	e, elect to recognize gain on the deemed sale of my interest in the				
E	Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a amount equal to my share of the post-1986 earnings and profits of the CFC as an excess excess distribution is greater than zero, also complete line 16 of Part V.	• , , , , , , , , , , , , , , , , ,				
F	Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.					
G□	Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Edistribution is greater than zero, also complete line 16, Part V.	e) PFIC. My holding period in the stock of the Section 1297(e)				
н 🗆	Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding pe defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 156 complete line 16. Part V	riod in the stock of the former PFIC includes the termination date, as				

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making						
	Election B, also complete lines 8a through 9c. See instructions.						
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a					
b	Enter the portion of line 6a that is included in income under section 951 or that may be						
	excluded under section 1293(g)	6b					
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c			
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a					
b	Enter the portion of line 7a that is included in income under section 951 or that may be						
	excluded under section 1293(g)	7b					
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun						
	used for your income tax return. See instructions			7c			
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.				
8 a	Add lines 6c and 7c		 I	8a			
b	Enter the total amount of cash and the fair market value of other property distributed						
	or deemed distributed to you during the tax year of the QEF. See instructions	8b					
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares						
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c					
d	Add lines 8b and 8c			8d			
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e			
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,				
	you may make Election B with respect to the amount on line 8e.	1 .	I				
	Enter the total tax for the tax year. See instructions	9a		_			
b	Enter the total tax for the tax year determined without regard to the amount entered	l					
	on line 8e	9b		_			
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	d by making				
D	Election B		ianal	9c			
	art IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>		
	Enter the fair market value of your PFIC stock at the end of the tax year			10a			
				10b			
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the least set of the last		-	40.			
	on your tax return. If a loss, go to line 11			10c			
	Enter any unreversed inclusions (as defined in section 1296(d))			11			
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Include this amount as an ordinary			10			
10	loss on your tax return			12			
13 If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:							
	a Enter the fair market value of the stock on the date of sale or disposition			13a 13b			
	b Enter the adjusted basis of the stock on the date of sale or disposition  c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your			100			
·				13c			
142				14a			
	b Enter any unreversed inclusions (as defined in section 1296(d))  b Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Include this amount as an ordinary			- ""			
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, complete line 14c			14b			
C	c Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a, loclude this amount on your tax						
	return according to the rules generally applicable for losses provided elsewhere in the Code and regulations			14c			
	Note: See instructions in case of multiple sales or dispositions.						

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Name of shareholder			Identifying number (see instructions)			
Ne	w H	ampshire Charitable Foundation	02-6005625			
		reet, and room or suite no. If a P.O. box, see instructions. easant Street	Shareholder tax year: calendar year 2023 or other tax year beginning and ending			
City	or town	n, state, and ZIP code or country rd, NH 03301-4005				
		of shareholder filing the return: Individual X Corporation Partnersh	ip S Corporation Nongrantor Trust Estate			
		y Excepted Specified Foreign Financial Assets are reported on this form. See instructions				
Qual	ifying I	nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to t	reat such stock as the stock of a Qualifying			
Insu	rance (	Corporation under the alternative facts and circumstances test within the meaning of section	on 1297(f)(2). See instructions			
		gn corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)	Employer identification number (if any)			
		otel Investments Debtco	98-1658153			
		nale) SARL				
Addr	ess (Ei	nter number, street, city or town, and country.)	Reference ID number (see instructions)			
26.	ΑВ	oulevard Royal	Tax year of foreign corporation, PFIC, or QEF: Calendar year 2023			
		bourg, LUXEMBOURG L-2449	or other tax year beginning ,			
		<b>3</b> ·	and ending , .			
P	art I	Summary of Annual Information (see instructions)	,			
Prov	ide the	following information with respect to all shares of the PFIC held by the shareholder:				
		cription of each class of shares held by the shareholder: Common Stock				
		Check if shares jointly owned with spouse.				
2	Date	shares acquired during the tax year, if applicable:				
3	Num	ber of shares held at the end of the tax year:				
4		e of shares held at the end of the tax year (check the appropriate box, if applicable):				
	٠,	X \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000	(d) \$150,001-200,000			
	(e)	If more than \$200,000, list value:				
_	_					
5		e of PFIC and amount of any excess distribution or gain treated as an excess distribution u	nder section 1291, inclusion under section 1293,			
		inclusion or deduction under section 1296 (check all boxes that apply):				
	(a)	Section 1291 \$				
	(b)	Section 1293 (Qualified Electing Fund) \$	Coo Ctotomont 20			
_	(c)	Section 1296 (Mark to Market) \$	See Statement 30			
		Elections (see instructions)				
A	Н	Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as	· · · · · ·			
В		<ul> <li>Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.</li> <li>Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.</li> </ul>				
С		Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-mar 1296(e). Complete Part IV.	ket the PFIC stock that is marketable within the meaning of section			
D		<b>Deemed Sale Election.</b> I, a shareholder on the first day of a PFIC's first tax year as a QEI	F, elect to recognize gain on the deemed sale of my interest in the			
_		PFIC. Enter gain or loss on line 15f of Part V.				
Ε		<b>Deemed Dividend Election.</b> I, a shareholder on the first day of a PFIC's first tax year as a amount equal to my share of the post-1986 earnings and profits of the CFC as an excess excess distribution is greater than zero, also complete line 16 of Part V.	• . , , , , , , , , , , , , , , , , , ,			
_		, ,				
F		<b>Election To Recognize Gain on Deemed Sale of PFIC.</b> I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.				
G		Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297( PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). I distribution is greater than zero, also complete line 16, Part V.	e) PFIC. My holding period in the stock of the Section 1297(e)			
н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding pe defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 complete line 16 Part V	riod in the stock of the former PFIC includes the termination date, as			

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making						
	Election B, also complete lines 8a through 9c. See instructions.						
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a					
b	Enter the portion of line 6a that is included in income under section 951 or that may be						
	excluded under section 1293(g)	6b					
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c			
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a					
b	Enter the portion of line 7a that is included in income under section 951 or that may be						
	excluded under section 1293(g)	7b					
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun						
	used for your income tax return. See instructions			7c			
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.				
8 a	Add lines 6c and 7c		 I	8a			
b	Enter the total amount of cash and the fair market value of other property distributed						
	or deemed distributed to you during the tax year of the QEF. See instructions	8b					
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares						
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c					
d	Add lines 8b and 8c			8d			
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e			
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,				
	you may make Election B with respect to the amount on line 8e.	1 .	I				
	Enter the total tax for the tax year. See instructions	9a		_			
b	Enter the total tax for the tax year determined without regard to the amount entered	l					
	on line 8e	9b		_			
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	d by making				
D	Election B		ianal	9c			
	art IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>		
	Enter the fair market value of your PFIC stock at the end of the tax year			10a			
				10b			
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the least set of the last		-	40.			
	on your tax return. If a loss, go to line 11			10c			
	Enter any unreversed inclusions (as defined in section 1296(d))			11			
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Include this amount as an ordinary			10			
10	loss on your tax return			12			
13 If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:							
	a Enter the fair market value of the stock on the date of sale or disposition			13a 13b			
	b Enter the adjusted basis of the stock on the date of sale or disposition  c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your			100			
·				13c			
142				14a			
	b Enter any unreversed inclusions (as defined in section 1296(d))  b Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Include this amount as an ordinary			- ""			
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, complete line 14c			14b			
C	c Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a, loclude this amount on your tax						
	return according to the rules generally applicable for losses provided elsewhere in the Code and regulations			14c			
	Note: See instructions in case of multiple sales or dispositions.						

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Name of shareholder			Identifying number (see instructions)			
Ne	w H	ampshire Charitable Foundation	02-6005625			
		reet, and room or suite no. If a P.O. box, see instructions.	Shareholder tax year: calendar year 2023 or other tax year beginning			
37	P1	easant Street	, and ending ,			
		n, state, and ZIP code or country rd, NH 03301-4005				
		of shareholder filing the return: Individual X Corporation Partnershi	ip S Corporation Nongrantor Trust Estate			
Che	ck if any	y Excepted Specified Foreign Financial Assets are reported on this form. See instructions .				
Qua	lifying I	nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to tr	eat such stock as the stock of a Qualifying			
Insu	rance (	Corporation under the alternative facts and circumstances test within the meaning of sectio	n 1297(f)(2). See instructions			
Namo	Employer identification number (if any)					
			98-1539474			
Add	ress (Ei	nter number, street, city or town, and country.)	Reference ID number (see instructions)			
26	АВ	oulevard Royal	Tax year of foreign corporation, PFIC, or QEF: Calendar year 2023			
Lu	xem	bourg, LUXEMBOURG L-2449	or other tax year beginning ,			
P	art I	Summary of Annual Information (see instructions)	Tand ending , .			
Prov	/ide the	following information with respect to all shares of the PFIC held by the shareholder:				
1	Desc	cription of each class of shares held by the shareholder: Common Stock				
		Check if shares jointly owned with spouse.				
2	Date	shares acquired during the tax year, if applicable:				
3	Num	ber of shares held at the end of the tax year:				
4		e of shares held at the end of the tax year (check the appropriate box, if applicable):	(1)			
	٠,	(c) X \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000 (d) \$150,001-200,000				
	(e)	If more than \$200,000, list value:				
5	Tyne	Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293,				
·		inclusion or deduction under section 1296 (check all boxes that apply):	idel 300tion 1231, inclusion direct 300tion 1230,			
	(a)	Section 1291 \$				
	(b)	Section 1293 (Qualified Electing Fund) \$				
	(c)	Section 1296 (Mark to Market) \$	See Statement 31			
P	art II	Elections (see instructions)				
Α		Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as	a QEF. Complete lines 6a through 7c of Part III.			
В		Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.  Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.				
С		<b>Election To Mark-to-Market PFIC Stock</b> . I, a shareholder of a PFIC, elect to mark-to-mark 1296(e). <i>Complete Part IV</i> .	ket the PFIC stock that is marketable within the meaning of section			
D		<b>Deemed Sale Election</b> . I, a shareholder on the first day of a PFIC's first tax year as a QEF PFIC. Enter gain or loss on line 15f of Part V.	e, elect to recognize gain on the deemed sale of my interest in the			
Ε		Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a				
amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15e excess distribution is greater than zero, also complete line 16 of Part V.						
F		<b>Election To Recognize Gain on Deemed Sale of PFIC.</b> I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.				
G		Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). E distribution is greater than zero, also complete line 16, Part V.	e) PFIC. My holding period in the stock of the Section 1297(e)			
Н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16, Part V.	riod in the stock of the former PFIC includes the termination date, as			

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making						
	Election B, also complete lines 8a through 9c. See instructions.						
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a					
b	Enter the portion of line 6a that is included in income under section 951 or that may be						
	excluded under section 1293(g)	6b					
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c			
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a					
b	Enter the portion of line 7a that is included in income under section 951 or that may be						
	excluded under section 1293(g)	7b					
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun						
	used for your income tax return. See instructions			7c			
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.				
8 a	Add lines 6c and 7c		 I	8a			
b	Enter the total amount of cash and the fair market value of other property distributed						
	or deemed distributed to you during the tax year of the QEF. See instructions	8b					
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares						
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c					
d	Add lines 8b and 8c			8d			
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack	kets)		8e			
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,				
	you may make Election B with respect to the amount on line 8e.	1 .	I				
	Enter the total tax for the tax year. See instructions	9a		_			
b	Enter the total tax for the tax year determined without regard to the amount entered	l					
	on line 8e	9b		_			
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	d by making				
D	Election B		ianal	9c			
	art IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>		
	Enter the fair market value of your PFIC stock at the end of the tax year			10a			
				10b			
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the least set of the last		-	40.			
	on your tax return. If a loss, go to line 11			10c			
	Enter any unreversed inclusions (as defined in section 1296(d))			11			
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Include this amount as an ordinary			10			
10	loss on your tax return			12			
13 If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:							
	a Enter the fair market value of the stock on the date of sale or disposition b Enter the adjusted basis of the stock on the date of sale or disposition			13a 13b			
	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as or			100			
·				13c			
142				14a			
	b Enter any unreversed inclusions (as defined in section 1296(d))  b Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Include this amount as an ordinary			- ""			
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, complete line 14c			14b			
C	c Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a, loclude this amount on your tax						
	return according to the rules generally applicable for losses provided elsewhere in the Code and regulations			14c			
	Note: See instructions in case of multiple sales or dispositions.						

#### Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Part V Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## Form **8621**(Rev. December 2018) Department of the Treasury Internal Revenue Service

### Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Attachment Sequence No. **69** 

Name of shareholder		areholder	Identifying number (see instructions)			
NT.	TT	amachina Chamitable Equadation	02-6005625			
		ampshire Charitable Foundation reet, and room or suite no. If a P.O. box, see instructions.	Shareholder tax year: calendar year 2023 or other tax year beginning			
		easant Street	, and ending			
		n, state, and ZIP code or country	, and onemig ,			
Co	nco	rd, NH 03301-4005				
		of shareholder filing the return: $igsqcup$ Individual $igsqcup X$ Corporation $igsqcup$ Partnershi	·			
		/ Excepted Specified Foreign Financial Assets are reported on this form. See instructions .				
		nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to tro				
		Corporation under the alternative facts and circumstances test within the meaning of section	Employer identification number (if any)			
		gn corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)  n Living Developments Holdings	Employer ruentification number (if any)			
	RL	i living bovelopments netaings	98-1572972			
		nter number, street, city or town, and country.)	Reference ID number (see instructions)			
		oulevard Royal	Tax year of foreign corporation, PFIC, or QEF: Calendar year $2023$			
Lu	xem	bourg, LUXEMBOURG L-2449	or other tax year beginning ,			
_			and ending , .			
	art I	(=========				
		following information with respect to all shares of the PFIC held by the shareholder: ription of each class of shares held by the shareholder: <b>Common Stock</b>				
1	Desc	Check if shares jointly owned with spouse.				
2	Date	shares acquired during the tax year, if applicable:				
_	5410					
3	Num	ber of shares held at the end of the tax year:				
4		e of shares held at the end of the tax year (check the appropriate box, if applicable):				
	٠,	X \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000	(d) \$150,001-200,000			
	(e)	If more than \$200,000, list value:				
5	Tyne	of PFIC and amount of any excess distribution or gain treated as an excess distribution ur	nder section 1291, inclusion under section 1293			
·		inclusion or deduction under section 1296 (check all boxes that apply):	and social 1231, molasion and social 1230,			
	(a)	Section 1291 \$				
	(b)	Section 1293 (Qualified Electing Fund) \$				
	(c)	Section 1296 (Mark to Market) \$	See Statement 32			
Р	art II	(				
Α	$\square$	$\textbf{Election To Treat the PFIC as a QEF.} \ \textbf{I, a shareholder of a PFIC, elect to treat the PFIC as} \\$	,			
В		<b>Election To Extend Time For Payment of Tax.</b> I, a shareholder of a QEF, elect to extend the QEF until this election is terminated. <i>Complete lines 8a through 9c of Part III to</i>	he time for payment of tax on the undistributed earnings and profits			
		<b>Note:</b> If any portion of line 6a or line 7a of Part III is includible under section 951, you may	y <b>not</b> make this election. Also, see sections			
С		1294(c) and 1294(f) and the related regulations for events that terminate this election.  Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-mark	cat the DEIC stock that is marketable within the manning of coation			
C		1296(e). Complete Part IV.	Reture PFIG Stock that is marketable within the meaning of section			
D		<b>Deemed Sale Election</b> . I, a shareholder on the first day of a PFIC's first tax year as a QEF	, elect to recognize gain on the deemed sale of my interest in the			
		PFIC. Enter gain or loss on line 15f of Part V.	,			
Ε		<b>Deemed Dividend Election</b> . I, a shareholder on the first day of a PFIC's first tax year as a				
		amount equal to my share of the post-1986 earnings and profits of the CFC as an excess	distribution. Enter this amount on line 15e of Part V. If the			
		excess distribution is greater than zero, also complete line 16 of Part V.				
F		Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last				
		gain on line 15f of Part V.	uay of its last las year as a FI to utiluer section 1231 (a). Etiler			
•	Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section					
G	ш	1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d).	PFIC. My holding period in the stock of the Section 1297(e)			
		distribution is greater than zero, also complete line 16, Part V.	inter the excess distribution on line 13e, Part V. II the excess			
Н		Deemed Dividend Election With Respect to a Former PFIC. I. a shareholder of a former	PFIC, within the meaning of Regulations section 1.1298-3(a),			
•		elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e	e, Part V. If the excess distribution is greater than zero. also			
		complete line 16, Part V.				

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making				
	Election B, also complete lines 8a through 9c. See instructions.				
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a			
b	Enter the portion of line 6a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	6b			
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a			
b	Enter the portion of line 7a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	7b			
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun				
	used for your income tax return. See instructions			7c	
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.		
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed				
	or deemed distributed to you during the tax year of the QEF. See instructions	8b			
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c			
d	Add lines 8b and 8c			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,		
	you may make Election B with respect to the amount on line 8e.	1 .	i.		
	Enter the total tax for the tax year. See instructions	9a		4	
b	Enter the total tax for the tax year determined without regard to the amount entered	١			
	on line 8e	9b	<u> </u>	4	
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making		
D	Election B		ional	9c	
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>
	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
				10b	
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of the last restriction of the last restriction of the last restriction.		-	۱.,	
	on your tax return. If a loss, go to line 11			10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0	
10	loss on your tax return			12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the Enter the fair market value of the stock on the date of sale or disposition	-		13a	
				13b	
			income on your	130	
·	c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your tax return. If a loss, go to line 14			13c	
1 <b>4</b> 2	- · · · · · · · · · · · · · · · · · · ·			14a	
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·	
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I				
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c	
	<b>Note:</b> See instructions in case of multiple sales or dispositions.	`			

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## (Rev. December 2018) Department of the Treasury Internal Revenue Service

### Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Attachment Sequence No. **69** 

Name of shareholder			Identifying number (see instruct	tions)
Ne	w H	ampshire Charitable Foundation	02-6005625	
		reet, and room or suite no. If a P.O. box, see instructions.  easant Street	Shareholder tax year: calendar year $2$	023 or other tax year beginning ending
		n, state, and ZIP code or country rd, NH 03301-4005		
		of shareholder filing the return: Individual X Corporation Partnershi	p S Corporation I	Nongrantor Trust Estate
Che	ck if any	y Excepted Specified Foreign Financial Assets are reported on this form. See instructions		
Qual	lifying I	nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to tr	eat such stock as the stock of a Q	ualifying
		Corporation under the alternative facts and circumstances test within the meaning of section		
		gn corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) oke Developments Topco SARL	Employer identification number 98–1551314	r (if any)
Add	ress (Ei	nter number, street, city or town, and country.)	Reference ID number (see instru	uctions)
	`	, , , , , , , , , , , , , , , , , , , ,	,	,
		oulevard Royal bourg, LUXEMBOURG L-2449	Tax year of foreign corporation, or other tax year beginning and ending	PFIC, or QEF: Calendar year $2023$ , , .
	art I	Summary of Annual Information (see instructions)		
Pro۱		following information with respect to all shares of the PFIC held by the shareholder:		
1	Desc	cription of each class of shares held by the shareholder: Common Stock		
•	 D-4-	Check if shares jointly owned with spouse.		
2	Date	shares acquired during the tax year, if applicable:		
3	Num	ber of shares held at the end of the tax year:		
4		e of shares held at the end of the tax year (check the appropriate box, if applicable):  X \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000	(d) \$150,001-200,000	
	٠,	If more than \$200,000, list value:	(u)	
	(-)			<del>-</del>
5	Туре	e of PFIC and amount of any excess distribution or gain treated as an excess distribution ur	nder section 1291, inclusion unde	r section 1293,
	and	inclusion or deduction under section 1296 (check all boxes that apply):		
	(a)	Section 1291 \$		
	(b)	Section 1293 (Qualified Electing Fund) \$	_	
_	(c)	Section 1296 (Mark to Market) \$	See	Statement 33
	art II		055 0 4 4 4 4 4 4 4	
A B		Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend t of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you ma	he time for payment of tax on the calculate the tax that may be	undistributed earnings and profits edeferred.
С		1294(c) and 1294(f) and the related regulations for events that terminate this election. <b>Election To Mark-to-Market PFIC Stock</b> . I, a shareholder of a PFIC, elect to mark-to-market.	ket the PFIC stock that is marketal	ole within the meaning of section
D		1296(e). Complete Part IV.  Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF	, elect to recognize gain on the de	emed sale of my interest in the
E		PFIC. Enter gain or loss on line 15f of Part V.	OFF that is a controlled foreign of	expectation (CEC), elect to treat an
_		<b>Deemed Dividend Election.</b> I, a shareholder on the first day of a PFIC's first tax year as a amount equal to my share of the post-1986 earnings and profits of the CFC as an excess excess distribution is greater than zero, also complete line 16 of Part V.		
F		<b>Election To Recognize Gain on Deemed Sale of PFIC.</b> I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.		
G		Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). E distribution is greater than zero, also complete line 16, Part V.	) PFIC. My holding period in the s inter the excess distribution of	tock of the Section 1297(e) n line 15e, Part V. If the excess
Н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16. Part V.	iod in the stock of the former PFIC	C includes the termination date, as

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making				
	Election B, also complete lines 8a through 9c. See instructions.				
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a			
b	Enter the portion of line 6a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	6b			
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a			
b	Enter the portion of line 7a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	7b			
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun				
	used for your income tax return. See instructions			7c	
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.		
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed				
	or deemed distributed to you during the tax year of the QEF. See instructions	8b			
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c			
d	Add lines 8b and 8c			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,		
	you may make Election B with respect to the amount on line 8e.	1 .	i.		
	Enter the total tax for the tax year. See instructions	9a		4	
b	Enter the total tax for the tax year determined without regard to the amount entered	١			
	on line 8e	9b	<u> </u>	4	
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making		
D	Election B		ional	9c	
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>
	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
				10b	
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of the last restriction of the last restriction of the last restriction.		-	۱.,	
	on your tax return. If a loss, go to line 11			10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0	
10	loss on your tax return			12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the Enter the fair market value of the stock on the date of sale or disposition	-		13a	
				13b	
			income on your	130	
·	c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your tax return. If a loss, go to line 14			13c	
1 <b>4</b> 2	- · · · · · · · · · · · · · · · · · · ·			14a	
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·	
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I				
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c	
	<b>Note:</b> See instructions in case of multiple sales or dispositions.	`			

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

### Information Return by a Shareholder of a Passive Foreign **Investment Company or Qualified Electing Fund**

OMB No. 1545-1002

Attachment ► Go to www.irs.gov/Form8621 for instructions and the latest information. Sequence No. 69 **Identifying number** (see instructions) Name of shareholder New Hampshire Charitable Foundation 02-6005625 Number, street, and room or suite no. If a P.O. box, see instructions. Shareholder tax year: calendar year 2023 or other tax year beginning 37 Pleasant Street and ending City or town, state, and ZIP code or country 03301-4005 Concord, NH Check type of shareholder filing the return: Individual X Corporation Partnership S Corporation Nongrantor Trust Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions ... Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) Employer identification number (if any) OCM Luxembourg NAC SARL 98-1591029 Address (Enter number, street, city or town, and country.) Reference ID number (see instructions) 26A Boulevard Royal Tax year of foreign corporation, PFIC, or QEF: Calendar year  $\overline{2023}$ Luxembourg, LUXEMBOURG L-2449 or other tax year beginning and ending Summary of Annual Information (see instructions) Provide the following information with respect to all shares of the PFIC held by the shareholder: Description of each class of shares held by the shareholder: Common Stock Check if shares jointly owned with spouse. Date shares acquired during the tax year, if applicable: Number of shares held at the end of the tax year: Value of shares held at the end of the tax year (check the appropriate box, if applicable): **(b)** \$50,001-100.000 (a) X \$0-50.000 (c) \$100.001-150.000 \$150.001-200.000 (e) If more than \$200,000, list value: Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply): Section 1291 \$ Section 1293 (Qualified Electing Fund) \$ (b) See Statement 34 (c) L Section 1296 (Mark to Market) \$ Part II Elections (see instructions) Lection To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III. Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.

Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections В 1294(c) and 1294(f) and the related regulations for events that terminate this election. Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e), Complete Part IV. Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line 15f of Part V. Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an Εl amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part V. Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line 15f of Part V. Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V. Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also

complete line 16. Part V.

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making				
	Election B, also complete lines 8a through 9c. See instructions.				
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a			
b	Enter the portion of line 6a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	6b			
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a			
b	Enter the portion of line 7a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	7b			
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun				
	used for your income tax return. See instructions			7c	
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.		
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed				
	or deemed distributed to you during the tax year of the QEF. See instructions	8b			
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c			
d	Add lines 8b and 8c			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,		
	you may make Election B with respect to the amount on line 8e.	1 .	i.		
	Enter the total tax for the tax year. See instructions	9a		4	
b	Enter the total tax for the tax year determined without regard to the amount entered	١			
	on line 8e	9b	<u> </u>	4	
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making		
D	Election B		ional	9c	
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>
	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
				10b	
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of the last restriction of the last restriction of the last restriction.		-	۱.,	
	on your tax return. If a loss, go to line 11			10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0	
10	loss on your tax return			12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the Enter the fair market value of the stock on the date of sale or disposition	-		13a	
				13b	
			income on your	130	
·	c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your tax return. If a loss, go to line 14			13c	
1 <b>4</b> 2	- · · · · · · · · · · · · · · · · · · ·			14a	
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·	
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I				
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c	
	<b>Note:</b> See instructions in case of multiple sales or dispositions.	`			

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## (Rev. December 2018) Department of the Treasury Internal Revenue Service

### Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Attachment Sequence No. **69** 

Name of shareholder		areholder	Identifying number (see instructions)
New Hampshire Charitable Foundation			02-6005625
		reet, and room or suite no. If a P.O. box, see instructions. easant Street	Shareholder tax year: calendar year 2023 or other tax year beginning and ending ,
		n, state, and ZIP code or country rd, NH 03301-4005	
		of shareholder filing the return: Individual X Corporation Partnersh	ip S Corporation Nongrantor Trust Estate
		y Excepted Specified Foreign Financial Assets are reported on this form. See instructions	
Qual	ifying l	nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to to	reat such stock as the stock of a Qualifying
Insu	rance C	Corporation under the alternative facts and circumstances test within the meaning of section	on 1297(f)(2). See instructions
		gn corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)	Employer identification number (if any)
		us Aviation Holdings Designated	00 1451452
		ity Company	98-1471473
Addı	ress (Ei	nter number, street, city or town, and country.)	Reference ID number (see instructions)
		wist House Block 1 W. Business Park on, IRELAND	Tax year of foreign corporation, PFIC, or QEF: Calendar year 2 0 2 3 or other tax year beginning and ending , .
Р	art I	Summary of Annual Information (see instructions)	-
		following information with respect to all shares of the PFIC held by the shareholder:	
1	Desc	cription of each class of shares held by the shareholder: Common Stock	
		Check if shares jointly owned with spouse.	
2	Date	shares acquired during the tax year, if applicable:	
3	Num	ber of shares held at the end of the tax year:	
	Mala		
4		e of shares held at the end of the tax year (check the appropriate box, if applicable): $X$ \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000	(d) \$150,001-200,000
	٠,	If more than \$200,000, list value:	(a) 5150,001-200,000
	(6)	πιοτε τιαπ φ200,000, list value.	
5	Type	e of PFIC and amount of any excess distribution or gain treated as an excess distribution u	nder section 1291 inclusion under section 1293
•		inclusion or deduction under section 1296 (check all boxes that apply):	
	(a)	Section 1291 \$	
	(b)	Section 1293 (Qualified Electing Fund) \$	
	(c)	Section 1296 (Mark to Market) \$	See Statement 35
P	art II	Elections (see instructions)	
Α		Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as	a QEF. Complete lines 6a through 7c of Part III.
В		Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend to the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may 1294(c) and 1294(f) and the related regulations for events that terminate this election.	o calculate the tax that may be deferred.
С		Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-mar 1296(e). Complete Part IV.	ket the PFIC stock that is marketable within the meaning of section
D		<b>Deemed Sale Election.</b> I, a shareholder on the first day of a PFIC's first tax year as a QEI PFIC. Enter gain or loss on line 15f of Part V.	e, elect to recognize gain on the deemed sale of my interest in the
E		<b>Deemed Dividend Election.</b> I, a shareholder on the first day of a PFIC's first tax year as a	• , , , , , , , , , , , , , , , , ,
		amount equal to my share of the post-1986 earnings and profits of the CFC as an excess excess distribution is greater than zero, also complete line 16 of Part V.	uistribution. Enter this amount on line 15e of Part V. If the
F		<b>Election To Recognize Gain on Deemed Sale of PFIC.</b> I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.	
G		<b>Deemed Dividend Election With Respect to a Section 1297(e) PFIC.</b> I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). A distribution is greater than zero, also complete line 16, Part V.	e) PFIC. My holding period in the stock of the Section 1297(e)
н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding pe defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 150 complete line 16. Part V	riod in the stock of the former PFIC includes the termination date, as

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making				
	Election B, also complete lines 8a through 9c. See instructions.				
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a			
b	Enter the portion of line 6a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	6b			
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a			
b	Enter the portion of line 7a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	7b			
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun				
	used for your income tax return. See instructions			7c	
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.		
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed				
	or deemed distributed to you during the tax year of the QEF. See instructions	8b			
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c			
d	Add lines 8b and 8c			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,		
	you may make Election B with respect to the amount on line 8e.	1 .	i.		
	Enter the total tax for the tax year. See instructions	9a		4	
b	Enter the total tax for the tax year determined without regard to the amount entered	١			
	on line 8e	9b	<u> </u>	4	
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making		
D	Election B		ional	9c	
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>
	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
				10b	
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of the last restriction of the last restriction of the last restriction.		-	۱.,	
	on your tax return. If a loss, go to line 11			10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0	
10	loss on your tax return			12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the Enter the fair market value of the stock on the date of sale or disposition	-		13a	
				13b	
			income on your	130	
·	c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your tax return. If a loss, go to line 14			13c	
1 <b>4</b> 2	- · · · · · · · · · · · · · · · · · · ·			14a	
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·	
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I				
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c	
	<b>Note:</b> See instructions in case of multiple sales or dispositions.	`			

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## (Rev. December 2018) Department of the Treasury Internal Revenue Service

### Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Attachment Sequence No. **69** 

Name of shareholder		areholder	Identifying number (see instructions)
New Hampshire Charitable Foundation			02-6005625
		reet, and room or suite no. If a P.O. box, see instructions. easant Street	Shareholder tax year: calendar year 2023 or other tax year beginning , and ending ,
		n, state, and ZIP code or country rd, NH 03301-4005	
		of shareholder filing the return: Individual X Corporation Partnersh	ip S Corporation Nongrantor Trust Estate
Chec	k if any	y Excepted Specified Foreign Financial Assets are reported on this form. See instructions	
		nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to t	
		Corporation under the alternative facts and circumstances test within the meaning of section	
		gn corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)  uxembourg Sunshine SARL	Employer identification number (if any)
A -1 -1	(F		98-1595652
Adar	ess (Ei	nter number, street, city or town, and country.)	Reference ID number (see instructions)
		oulevard Royal bourg, LUXEMBOURG L-2449	Tax year of foreign corporation, PFIC, or QEF: Calendar year 2023 or other tax year beginning , and ending , .
	art I	Summary of Annual Information (see instructions)	
		following information with respect to all shares of the PFIC held by the shareholder: cription of each class of shares held by the shareholder: Common Stock Check if shares jointly owned with spouse.	
2	∟_ Date	shares acquired during the tax year, if applicable:	
_	Date	Shares acquired during the tax year, if applicable.	
3	Num	ber of shares held at the end of the tax year:	
4	Valu	e of shares held at the end of the tax year (check the appropriate box, if applicable):	
7		<b>X</b> \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000	( <b>d</b> ) \$150,001-200,000
	٠,	If more than \$200,000, list value:	(u)
	(-)		<del></del>
5	Type	e of PFIC and amount of any excess distribution or gain treated as an excess distribution u	nder section 1291, inclusion under section 1293,
	and i	inclusion or deduction under section 1296 (check all boxes that apply):	
	(a)	Section 1291 \$	
	(b)	Section 1293 (Qualified Electing Fund) \$	
_	(c)	Section 1296 (Mark to Market) \$	See Statement 36
_		Elections (see instructions)	
В		Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may 1004 for the betaled explorion of the part III to the production of the part III to the part III	the time for payment of tax on the undistributed earnings and profits o calculate the tax that may be deferred.
С		1294(c) and 1294(f) and the related regulations for events that terminate this election. <b>Election To Mark-to-Market PFIC Stock</b> . I, a shareholder of a PFIC, elect to mark-to-mar 1296(e). <i>Complete Part IV</i> .	ket the PFIC stock that is marketable within the meaning of section
D		<b>Deemed Sale Election.</b> I, a shareholder on the first day of a PFIC's first tax year as a QEI	F, elect to recognize gain on the deemed sale of my interest in the
E		PFIC. Enter gain or loss on line 15f of Part V.  Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a shareholder on the first day of a PFIC's first tax year and tax years and tax year and tax year and tax year and	• • • • • • • • • • • • • • • • • • • •
		amount equal to my share of the post-1986 earnings and profits of the CFC as an excess excess distribution is greater than zero, also complete line 16 of Part V.	
F		<b>Election To Recognize Gain on Deemed Sale of PFIC.</b> I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.	day of its last tax year as a PFIC under section 1297(a). Enter
G		<b>Deemed Dividend Election With Respect to a Section 1297(e) PFIC.</b> I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297( PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). A distribution is greater than zero, also complete line 16, Part V.	e) PFIC. My holding period in the stock of the Section 1297(e) Enter the excess distribution on line 15e, Part V. If the excess
Н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding pe defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 complete line 16. Part V	riod in the stock of the former PFIC includes the termination date, as

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making				
	Election B, also complete lines 8a through 9c. See instructions.				
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a			
b	Enter the portion of line 6a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	6b			
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a			
b	Enter the portion of line 7a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	7b			
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun				
	used for your income tax return. See instructions			7c	
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.		
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed				
	or deemed distributed to you during the tax year of the QEF. See instructions	8b			
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c			
d	Add lines 8b and 8c			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,		
	you may make Election B with respect to the amount on line 8e.	1 .	i.		
	Enter the total tax for the tax year. See instructions	9a		4	
b	Enter the total tax for the tax year determined without regard to the amount entered	١			
	on line 8e	9b	<u> </u>	4	
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making		
D	Election B		ional	9c	
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>
	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
				10b	
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of the last restriction of the last restriction of the last restriction.		-	۱.,	
	on your tax return. If a loss, go to line 11			10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0	
10	loss on your tax return			12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the Enter the fair market value of the stock on the date of sale or disposition	-		13a	
				13b	
			income on your	130	
·	c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your tax return. If a loss, go to line 14			13c	
1 <b>4</b> 2	- · · · · · · · · · · · · · · · · · · ·			14a	
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·	
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I				
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c	
	<b>Note:</b> See instructions in case of multiple sales or dispositions.	`			

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

### Form **8621**(Rev. December 2018) Department of the Treasury Internal Revenue Service

## Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund So to www.irs.gov/Form8621 for instructions and the latest information. OMB No. 1545-1002 Attachment Sequence No. 69

(Rev. Depa	Decemb rtment o	of the Treasury	_	Attachment
Intern	al Rever	nue Service Go to www.irs.gov/Form8621 for instructions ar		Sequence No. <b>69</b>
Nam	e of sh	areholder	Identifying number (see instructions)	
Ma	., U	ampshire Charitable Foundation	02-6005625	
		<del>-</del>	Shareholder tax year: calendar year 2023 or ot	
		reet, and room or suite no. If a P.O. box, see instructions. easant Street	· ·	her tax year beginning
			, and ending	,
		n, state, and ZIP code or country rd, NH 03301–4005		
			p S Corporation Nongrantor	Trust Estate
		y Excepted Specified Foreign Financial Assets are reported on this form. See instructions.		
		nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to tr		
		Corporation under the alternative facts and circumstances test within the meaning of section		
		gn corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)	Employer identification number (if any)	
		uxembourg QH Track SARL		
		5 ~	98-1483273	
Addr	ess (Er	nter number, street, city or town, and country.)	Reference ID number (see instructions)	
	`	, , , , , , , , , , , , , , , , , , , ,	,	
26	ΑВ	oulevard Royal	Tax year of foreign corporation, PFIC, or QE	F: Calendar vear 2023
Lu	xem	bourg, LUXEMBOURG L-2449	or other tax year beginning	
		•	and ending	,
P	art I	Summary of Annual Information (see instructions)		
Prov	ide the	following information with respect to all shares of the PFIC held by the shareholder:		
1	Desc	cription of each class of shares held by the shareholder: Common Stock		
		Check if shares jointly owned with spouse.		
2	Date	shares acquired during the tax year, if applicable:		
3	Num	ber of shares held at the end of the tax year:		
4	Valu	e of shares held at the end of the tax year (check the appropriate box, if applicable):		
	(a)	X \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000	(d) \$150,001-200,000	
	(e)	If more than \$200,000, list value:		
5	Type	e of PFIC and amount of any excess distribution or gain treated as an excess distribution un	nder section 1291, inclusion under section 12	293,
	and i	inclusion or deduction under section 1296 (check all boxes that apply):		
	(a)	Section 1291 \$		
	(b)	Section 1293 (Qualified Electing Fund) \$		
	(c)	Section 1296 (Mark to Market) \$	See State	ment 37
P	art II	Elections (see instructions)		
Α		Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as	a QEF. Complete lines 6a through 7c of I	Part III.
В		Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend t	he time for payment of tax on the undistribute	ed earnings and profits
		of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you ma	o calculate the tax that may be deferred.  v <b>not</b> make this election. Also, see sections	
		1294(c) and 1294(f) and the related regulations for events that terminate this election.	y not make this decition. Also, see sections	
С		Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-mark	ket the PFIC stock that is marketable within th	ne meaning of section
		1296(e). Complete Part IV.		
D		Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF	, elect to recognize gain on the deemed sale	of my interest in the
		PFIC. Enter gain or loss on line 15f of Part V.		
Ε		Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a	QEF that is a controlled foreign corporation (	(CFC), elect to treat an
		amount equal to my share of the post-1986 earnings and profits of the CFC as an excess	distribution. Enter this amount on line 15	e of Part V. If the
		excess distribution is greater than zero, also complete line 16 of Part V.		
F		Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC		
		distribution the gain recognized on the deemed sale of my interest in the PFIC on the last		
		gain on line 15f of Part V.		
G		Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(ε	a section 1297(e) PFIC, within the meaning of	of Regulations section
-		PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). <i>E</i>		
		distribution is greater than zero, also complete line 16, Part V.		
н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per		
-		defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 156		

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making				
	Election B, also complete lines 8a through 9c. See instructions.				
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a			
b	Enter the portion of line 6a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	6b			
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c	
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a			
b	Enter the portion of line 7a that is included in income under section 951 or that may be				
	excluded under section 1293(g)	7b			
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun				
	used for your income tax return. See instructions			7c	
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.		
8 a	Add lines 6c and 7c			8a	
b	Enter the total amount of cash and the fair market value of other property distributed				
	or deemed distributed to you during the tax year of the QEF. See instructions	8b			
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares				
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c			
d	Add lines 8b and 8c			8d	
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e	
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,		
	you may make Election B with respect to the amount on line 8e.	1 .	i.		
	Enter the total tax for the tax year. See instructions	9a		4	
b	Enter the total tax for the tax year determined without regard to the amount entered	١			
	on line 8e	9b	<u> </u>	4	
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making		
D	Election B		ional	9c	
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>
	Enter the fair market value of your PFIC stock at the end of the tax year			10a	
				10b	
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of the last restriction of the last restriction of the last restriction.		-	۱.,	
	on your tax return. If a loss, go to line 11			10c	
	Enter any unreversed inclusions (as defined in section 1296(d))			11	
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0	
10	loss on your tax return			12	
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the Enter the fair market value of the stock on the date of sale or disposition	-		13a	
				13b	
			income on your	130	
·	c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your tax return. If a loss, go to line 14			13c	
1 <b>4</b> 2	- · · · · · · · · · · · · · · · · · · ·			14a	
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·	
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b	
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I				
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c	
	<b>Note:</b> See instructions in case of multiple sales or dispositions.	`			

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

# Form **8621**(Rev. December 2018) Department of the Treasury Internal Revenue Service

### Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Attachment Sequence No. **69** 

Name of s	shareholder	Identifying number (see instructions)				
New 1	Hampshire Charitable Foundation	02-6005625				
	street, and room or suite no. If a P.O. box, see instructions.  leasant Street	Shareholder tax year: calendar year 2023 or other tax year beginning and ending				
City or to	wn, state, and ZIP code or country ord, NH 03301-4005	, and ending ,				
	e of shareholder filing the return: Individual X Corporation Parti	nership S Corporation Nongrantor Trust Estate				
	ny Excepted Specified Foreign Financial Assets are reported on this form. See instructi					
	Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elec					
	Corporation under the alternative facts and circumstances test within the meaning of					
	reign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)	Employer identification number (if any)				
	Redwood Asset Management					
Hold:	ing SARL	98-1432293				
Address (	Enter number, street, city or town, and country.)	Reference ID number (see instructions)				
26A	Boulevard Royal	Tax year of foreign corporation, PFIC, or QEF: Calendar year 2023				
	mbourg, LUXEMBOURG L-2449	or other tax year beginning				
		and ending , .				
Part	Summary of Annual Information (see instructions)	and onding , .				
	ne following information with respect to all shares of the PFIC held by the shareholder:					
	scription of each class of shares held by the shareholder: Common Stock					
	Check if shares jointly owned with spouse.					
<b>2</b> Da	te shares acquired during the tax year, if applicable:					
<b>3</b> Nu	mber of shares held at the end of the tax year:					
	lue of shares held at the end of the tax year (check the appropriate box, if applicable):	000 (I)				
` '	X \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,0	000 <b>(d)</b> \$150,001-200,000				
(e)	) If more than \$200,000, list value:					
<b>5</b> Ty	pe of PFIC and amount of any excess distribution or gain treated as an excess distribut	tion under section 1291, inclusion under section 1293.				
	d inclusion or deduction under section 1296 (check all boxes that apply):	and and cooled less, included and cooled less,				
(a)	`````					
(b)	Section 1293 (Qualified Electing Fund) \$					
(c)	Section 1296 (Mark to Market) \$	See Statement 38				
Part	II Elections (see instructions)					
Α	<b>Election To Treat the PFIC as a QEF</b> . I, a shareholder of a PFIC, elect to treat the PF	FIC as a QEF. Complete lines 6a through 7c of Part III.				
В	Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to ex of the QEF until this election is terminated. Complete lines 8a through 9c of Par Note: If any portion of line 6a or line 7a of Part III is includible under section 951, yr 1294(c) and 1294(f) and the related regulations for events that terminate this election.	rt III to calculate the tax that may be deferred. ou may <b>not</b> make this election. Also, see sections				
С	Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to 1296(e). Complete Part IV.	p-market the PFIC stock that is marketable within the meaning of section				
<b>D</b>	Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as PFIC. Enter gain or loss on line 15f of Part V.	a QEF, elect to recognize gain on the deemed sale of my interest in the				
E	Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year					
	amount equal to my share of the post-1986 earnings and profits of the CFC as an exexcess distribution is greater than zero, also complete line 16 of Part V.	xcess distribution. Enter this amount on line 15e of Part V. If the				
F _	Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former distribution the gain recognized on the deemed sale of my interest in the PFIC on th gain on line 15f of Part V.					
G 🗆	Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a sharehold 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1 PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3 distribution is greater than zero, also complete line 16, Part V.	1297(e) PFIC. My holding period in the stock of the Section 1297(e)				
н 🗆	distribution is greater than zero, also complete line 16, Part V.  Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.					

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making						
	Election B, also complete lines 8a through 9c. See instructions.						
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a					
b	Enter the portion of line 6a that is included in income under section 951 or that may be						
	excluded under section 1293(g)	6b					
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c			
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a					
b	Enter the portion of line 7a that is included in income under section 951 or that may be						
	excluded under section 1293(g)	7b					
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun						
	used for your income tax return. See instructions			7c			
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.				
8 a	Add lines 6c and 7c			8a			
b	Enter the total amount of cash and the fair market value of other property distributed						
	or deemed distributed to you during the tax year of the QEF. See instructions	8b					
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares						
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c					
d	Add lines 8b and 8c			8d			
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e			
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,				
	you may make Election B with respect to the amount on line 8e.	1 .	I				
	Enter the total tax for the tax year. See instructions	9a		_			
b	Enter the total tax for the tax year determined without regard to the amount entered	l					
	on line 8e	9b		_			
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	d by making				
D	Election B		ianal	9c			
	art IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>		
	Enter the fair market value of your PFIC stock at the end of the tax year			10a			
				10b			
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the least set of the last		-	40.			
	on your tax return. If a loss, go to line 11			10c			
	Enter any unreversed inclusions (as defined in section 1296(d))			11			
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			10			
10	loss on your tax return			12			
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the	-		13a			
	a Enter the fair market value of the stock on the date of sale or disposition			13b			
	b Enter the adjusted basis of the stock on the date of sale or disposition  c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your			100			
·				13c			
142				14a			
	b Enter any unreversed inclusions (as defined in section 1296(d))  b Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Include this amount as an ordinary			- ""			
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, complete line 14c			14b			
C	c Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a, loclude this amount on your tax						
	return according to the rules generally applicable for losses provided elsewhere in the Code and regulations			14c			
	Note: See instructions in case of multiple sales or dispositions.						

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## (Rev. December 2018) Department of the Treasury Internal Revenue Service

### Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Attachment Sequence No. **69** 

Name of shareholder			Identifying number (see instructions)			
Ne	w H	ampshire Charitable Foundation	02-6005625			
		reet, and room or suite no. If a P.O. box, see instructions.	Shareholder tax year: calendar year 2023 or other tax year beginning			
37	P1	easant Street	, and ending , .			
		n, state, and ZIP code or country rd, NH 03301-4005				
Che	k type	of shareholder filing the return: Individual X Corporation Partnershi	p S Corporation Nongrantor Trust Estate			
		y Excepted Specified Foreign Financial Assets are reported on this form. See instructions .				
		nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to tr				
		Corporation under the alternative facts and circumstances test within the meaning of sectio				
		gn corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)  prite II SARL	Employer identification number (if any)  98–1627186			
Addı	ess (E	nter number, street, city or town, and country.)	Reference ID number (see instructions)			
٠.	, D		2022			
		oulevard Royal bourg, LUXEMBOURG L-2449	Tax year of foreign corporation, PFIC, or QEF: Calendar year 2023 or other tax year beginning , and ending ,			
Р	art I	Summary of Annual Information (see instructions)	and ending , .			
Prov	ide the	following information with respect to all shares of the PFIC held by the shareholder:				
1	Desc	eription of each class of shares held by the shareholder: Common Stock				
		Check if shares jointly owned with spouse.				
2	Date	shares acquired during the tax year, if applicable:				
3	Num	ber of shares held at the end of the tax year:				
4	Volu	e of shares held at the end of the tax year (check the appropriate box, if applicable):				
4		X \$0-50,000 (b) $S$ \$50,001-100,000 (c) $S$ \$100,001-150,000	(d) \$150,001-200,000			
	٠,	) If more than \$200,000, list value:				
	(-)					
5	Туре	e of PFIC and amount of any excess distribution or gain treated as an excess distribution ur	der section 1291, inclusion under section 1293,			
	and	inclusion or deduction under section 1296 (check all boxes that apply):				
	(a)	Section 1291 \$				
	(b)	Section 1293 (Qualified Electing Fund) \$	~ ~ ~ · · · · · · · · · · · · · · · · ·			
_	(c)	Section 1296 (Mark to Market) \$	See Statement 39			
_	art II					
В		Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.  Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.  Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections				
		1294(c) and 1294(f) and the related regulations for events that terminate this election.				
С	Ш	<b>Election To Mark-to-Market PFIC Stock</b> . I, a shareholder of a PFIC, elect to mark-to-mark 1296(e). <i>Complete Part IV</i> .	tet the PFIC stock that is marketable within the meaning of section			
D		<b>Deemed Sale Election</b> . I, a shareholder on the first day of a PFIC's first tax year as a QEF PFIC. <i>Enter gain or loss on line 15f of Part V.</i>	, elect to recognize gain on the deemed sale of my interest in the			
Ε		Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part V.				
F		Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line 15f of Part V.				
G		Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). E distribution is greater than zero, also complete line 16, Part V.	) PFIC. My holding period in the stock of the Section 1297(e)			
Н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16, Part V.	iod in the stock of the former PFIC includes the termination date, as			

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making						
	Election B, also complete lines 8a through 9c. See instructions.						
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a					
b	Enter the portion of line 6a that is included in income under section 951 or that may be						
	excluded under section 1293(g)	6b					
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c			
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a					
b	Enter the portion of line 7a that is included in income under section 951 or that may be						
	excluded under section 1293(g)	7b					
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun						
	used for your income tax return. See instructions			7c			
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.				
8 a	Add lines 6c and 7c		 I	8a			
b	Enter the total amount of cash and the fair market value of other property distributed						
	or deemed distributed to you during the tax year of the QEF. See instructions	8b					
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares						
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c					
d	Add lines 8b and 8c			8d			
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e			
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,				
	you may make Election B with respect to the amount on line 8e.	1 .	I				
	Enter the total tax for the tax year. See instructions	9a		_			
b	Enter the total tax for the tax year determined without regard to the amount entered	l					
	on line 8e	9b		_			
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	d by making				
D	Election B		ianal	9c			
	art IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>		
	Enter the fair market value of your PFIC stock at the end of the tax year			10a			
				10b			
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the least set of the last		-	40.			
	on your tax return. If a loss, go to line 11			10c			
	Enter any unreversed inclusions (as defined in section 1296(d))			11			
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			10			
10	loss on your tax return			12			
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the	-		13a			
	a Enter the fair market value of the stock on the date of sale or disposition			13b			
	b Enter the adjusted basis of the stock on the date of sale or disposition  c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your			100			
·				13c			
142				14a			
	b Enter any unreversed inclusions (as defined in section 1296(d))  b Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Include this amount as an ordinary			- ""			
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, complete line 14c			14b			
C	c Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a, loclude this amount on your tax						
	return according to the rules generally applicable for losses provided elsewhere in the Code and regulations			14c			
	Note: See instructions in case of multiple sales or dispositions.						

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

# Form **8621**(Rev. December 2018) Department of the Treasury Internal Revenue Service

### Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Attachment Sequence No. **69** 

Name of shareholder			Identifying number (see instructions)					
Ne	w H	ampshire Charitable Foundation	02-6005625					
Num	ber, stı	reet, and room or suite no. If a P.O. box, see instructions.  easant Street		2023 or other tax year beginning dending				
		n, state, and ZIP code or country	, di	d ending ,				
		rd, NH 03301-4005						
		of shareholder filing the return: Individual X Corporation Parti	·					
		y Excepted Specified Foreign Financial Assets are reported on this form. See instructi nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elec						
		corporation under the alternative facts and circumstances test within the meaning of						
		gn corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)	Employer identification numb					
		otel Investments Debtco 2		(ii diiy)				
( A	rse	nale) SARL	98-1661418					
Addı	ess (Ei	nter number, street, city or town, and country.)	Reference ID number (see ins	tructions)				
26	7 D	1						
		oulevard Royal bourg, LUXEMBOURG L-2449		n, PFIC, or QEF: Calendar year $2023$				
ьu	хеш	Dourg, Loxembooks 1-2449	or other tax year beginning and ending	,				
D	art I	Summary of Annual Information (see instructions)	and ending	, -				
		following information with respect to all shares of the PFIC held by the shareholder:						
1		pription of each class of shares held by the shareholder: $Common \ Stock$						
•		Check if shares jointly owned with spouse.						
2	Date	shares acquired during the tax year, if applicable:						
3	Num	ber of shares held at the end of the tax year:						
4		Value of shares held at the end of the tax year (check the appropriate box, if applicable):						
	` '	(a) X \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000 (d) \$150,001-200,000						
	(e)	If more than \$200,000, list value:						
5	Typo	of PFIC and amount of any excess distribution or gain treated as an excess distribut	ion under section 1201, inclusion un	der caction 1202				
J		inclusion or deduction under section 1296 (check all boxes that apply):	ion under section 1291, inclusion un	der Section 1233,				
	(a)	Section 1291 \$						
	(b)	Section 1293 (Qualified Electing Fund) \$						
	(c)	Section 1296 (Mark to Market) \$	See	Statement 40				
Р	art II	Elections (see instructions)						
Α		Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PF	IC as a QEF. Complete lines 6a thr	ough 7c of Part III.				
В		Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the OFF methods and a shareholder of a QEF, elect to extend the offer payment of the OFF methods are a shareholder of a QEF, elect to extend the offer payment of the offer pa	end the time for payment of tax on th	e undistributed earnings and profits				
		of the QEF until this election is terminated. Complete lines 8a through 9c of Par <b>Note</b> : If any portion of line 6a or line 7a of Part III is includible under section 951, yo	t III to calculate the tax that may but may have this election. Also, s	be deterred. see sections				
		1294(c) and 1294(f) and the related regulations for events that terminate this election.						
С		Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to	-market the PFIC stock that is marke	table within the meaning of section				
_		1296(e). Complete Part IV.	o OFF plant to recognize gain on the	doomed cale of my interest in the				
D		<b>Deemed Sale Election.</b> I, a shareholder on the first day of a PFIC's first tax year as PFIC. <i>Enter gain or loss on line 15f of Part V.</i>	a QEF, elect to recognize gain on the	deemed sale of my interest in the				
Е		<b>Deemed Dividend Election.</b> I, a shareholder on the first day of a PFIC's first tax year	r as a OFF that is a controlled foreign	cornoration (CEC) elect to treat an				
		amount equal to my share of the post-1986 earnings and profits of the CFC as an ex-						
		excess distribution is greater than zero, also complete line 16 of Part V.						
F		Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former						
		distribution the gain recognized on the deemed sale of my interest in the PFIC on the	e last day of its last tax year as a PFIC	under section 1297(a). Enter				
		gain on line 15f of Part V.	lay of a cooking 4007/-> PEIO - 1911	the meaning of Deputations and				
G		Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a sharehold 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1	ier or a section 1297(e) PFIC, within t 297(e) PFIC. Mv holding period in the	the meaning of Regulations section estock of the Section 1297(e)				
		PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3						
		distribution is greater than zero, also complete line 16, Part V.	rmor DEIC within the meening of De	gulations saction 1 1909 9/a				
Н		<b>Deemed Dividend Election With Respect to a Former PFIC.</b> I, a shareholder of a for elect to make a deemed dividend election with respect to the former PFIC. My holding	ig period in the stock of the former P	FIC includes the termination date, as				
		defined in Regulations section 1.1298-3(d). Enter the excess distribution on line						

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making						
	Election B, also complete lines 8a through 9c. See instructions.						
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a					
b	Enter the portion of line 6a that is included in income under section 951 or that may be						
	excluded under section 1293(g)	6b					
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c			
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a					
b	Enter the portion of line 7a that is included in income under section 951 or that may be						
	excluded under section 1293(g)	7b					
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun						
	used for your income tax return. See instructions			7c			
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.				
8 a	Add lines 6c and 7c		 I	8a			
b	Enter the total amount of cash and the fair market value of other property distributed						
	or deemed distributed to you during the tax year of the QEF. See instructions	8b					
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares						
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c					
d	Add lines 8b and 8c			8d			
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack	kets)		8e			
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,				
	you may make Election B with respect to the amount on line 8e.	1 .	I				
	Enter the total tax for the tax year. See instructions	9a		_			
b	Enter the total tax for the tax year determined without regard to the amount entered	l					
	on line 8e	9b		_			
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	d by making				
D	Election B		ianal	9c			
	art IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>		
	Enter the fair market value of your PFIC stock at the end of the tax year			10a			
				10b			
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the least set of the last		-	40.			
	on your tax return. If a loss, go to line 11			10c			
	Enter any unreversed inclusions (as defined in section 1296(d))			11			
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			10			
10	loss on your tax return			12			
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the	-		13a			
	a Enter the fair market value of the stock on the date of sale or disposition			13b			
	b Enter the adjusted basis of the stock on the date of sale or disposition  c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your			100			
·				13c			
142				14a			
	b Enter any unreversed inclusions (as defined in section 1296(d))  b Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Include this amount as an ordinary			- ""			
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, complete line 14c			14b			
C	c Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a, loclude this amount on your tax						
	return according to the rules generally applicable for losses provided elsewhere in the Code and regulations			14c			
	Note: See instructions in case of multiple sales or dispositions.						

#### Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Part V Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Name of shareholder			Identifying number (see instructions)		
Ne	w H	ampshire Charitable Foundation	02-6005625		
	-	reet, and room or suite no. If a P.O. box, see instructions. easant Street	Shareholder tax year: calendar year 2023 or other tax year beginning , and ending ,		
		n, state, and ZIP code or country rd, NH 03301-4005			
		of shareholder filing the return: Individual X Corporation Partnersl	nip S Corporation Nongrantor Trust Estate		
Che	ck if any	y Excepted Specified Foreign Financial Assets are reported on this form. See instructions			
		nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to t			
		Corporation under the alternative facts and circumstances test within the meaning of secti			
		gn corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) oir RE LTD	Employer identification number (if any)		
Add	ress (Ei	nter number, street, city or town, and country.)	Reference ID number (see instructions) U60		
45	Re	id Street	Tax year of foreign corporation, PFIC, or QEF: Calendar year 2023		
На	mi1	ton, BERMUDA 12 BD	or other tax year beginning ,		
			and ending , .		
	art I	Summary of Annual Information (see instructions)			
		following information with respect to all shares of the PFIC held by the shareholder:			
1	Desc	cription of each class of shares held by the shareholder: Common Stock			
		Check if shares jointly owned with spouse.			
2	Date	shares acquired during the tax year, if applicable:			
3	Num	ber of shares held at the end of the tax year:			
	Mala				
4		e of shares held at the end of the tax year (check the appropriate box, if applicable): $X$ \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000	( <b>d</b> ) \$150,001-200,000		
	٠,	If more than \$200,000, list value:	(u) 5150,001-200,000		
	(6)	πιοτε τιαπ φ200,000, list value.			
5	Type	e of PFIC and amount of any excess distribution or gain treated as an excess distribution u	inder section 1291 inclusion under section 1293		
		inclusion or deduction under section 1296 (check all boxes that apply):			
	(a)	Section 1291 \$			
	(b)	Section 1293 (Qualified Electing Fund) \$			
	(c)	Section 1296 (Mark to Market) \$	See Statement 41		
P	art II	Elections (see instructions)			
Α		Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC a	s a QEF. Complete lines 6a through 7c of Part III.		
В		Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend of the QEF until this election is terminated. <i>Complete lines 8a through 9c of Part III</i> Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you m 1294(c) and 1294(f) and the related regulations for events that terminate this election.	to calculate the tax that may be deferred.		
С		<b>Election To Mark-to-Market PFIC Stock</b> . I, a shareholder of a PFIC, elect to mark-to-ma 1296(e). <i>Complete Part IV</i> .	rket the PFIC stock that is marketable within the meaning of section		
D		<b>Deemed Sale Election</b> . I, a shareholder on the first day of a PFIC's first tax year as a QE PFIC. <i>Enter gain or loss on line 15f of Part V.</i>	F, elect to recognize gain on the deemed sale of my interest in the		
Е		<b>Deemed Dividend Election.</b> I, a shareholder on the first day of a PFIC's first tax year as amount equal to my share of the post-1986 earnings and profits of the CFC as an excess excess distribution is greater than zero, also complete line 16 of Part V.	• • • • • • • • • • • • • • • • • • • •		
F		<b>Election To Recognize Gain on Deemed Sale of PFIC.</b> I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the las gain on line 15f of Part V.			
G		<b>Deemed Dividend Election With Respect to a Section 1297(e) PFIC.</b> I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). <i>distribution is greater than zero, also complete line 16, Part V.</i>	(e) PFIC. My holding period in the stock of the Section 1297(e)		
н		<b>Deemed Dividend Election With Respect to a Former PFIC.</b> I, a shareholder of a forme elect to make a deemed dividend election with respect to the former PFIC. My holding pe defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 complete line 16 Part V	eriod in the stock of the former PFIC includes the termination date, as		

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making					
	Election B, also complete lines 8a through 9c. See instructions.					
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a				
b	Enter the portion of line 6a that is included in income under section 951 or that may be					
	excluded under section 1293(g)	6b				
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c		
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a				
b	Enter the portion of line 7a that is included in income under section 951 or that may be					
	excluded under section 1293(g)	7b				
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun					
	used for your income tax return. See instructions			7c		
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.			
8 a	Add lines 6c and 7c			8a		
b	Enter the total amount of cash and the fair market value of other property distributed					
	or deemed distributed to you during the tax year of the QEF. See instructions	8b				
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares					
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c				
d	Add lines 8b and 8c			8d		
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e		
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,			
	you may make Election B with respect to the amount on line 8e.	1 .	i.			
	Enter the total tax for the tax year. See instructions	9a		4		
b	Enter the total tax for the tax year determined without regard to the amount entered	١				
	on line 8e	9b	<u> </u>	4		
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making			
D	Election B		ional	9c		
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>	
	Enter the fair market value of your PFIC stock at the end of the tax year			10a		
				10b		
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of the last restriction of the last restriction of the last restriction.		-	۱.,		
	on your tax return. If a loss, go to line 11			10c		
	Enter any unreversed inclusions (as defined in section 1296(d))			11		
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0		
10	loss on your tax return			12		
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the Enter the fair market value of the stock on the date of sale or disposition	-		13a		
				13b		
			income on your	130		
·	c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your tax return. If a loss, go to line 14			13c		
1 <b>4</b> 2	- · · · · · · · · · · · · · · · · · · ·			14a		
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·		
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b		
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I					
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c		
	Note: See instructions in case of multiple sales or dispositions.					

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c **d** Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Name of shareholder			Identifying number (see instructions)		
Ne	w H	ampshire Charitable Foundation	02-6005625		
		reet, and room or suite no. If a P.O. box, see instructions.  easant Street	Shareholder tax year: calendar year 2023 or other , and ending	r tax year beginning	
		n, state, and ZIP code or country rd, NH 03301-4005			
		of shareholder filing the return: Individual X Corporation Partnershi	S Corporation Nongrantor T	rust Estate	
Che	ck if any	y Excepted Specified Foreign Financial Assets are reported on this form. See instructions .			
		nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to tr			
		Corporation under the alternative facts and circumstances test within the meaning of section			
		gn corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)  ee Opps XB VMO II LTD	Employer identification number (if any)		
A -1 -1-	/F.		98-1555010		
Addi	ress (Ei	nter number, street, city or town, and country.)	Reference ID number (see instructions)		
		spital Road e Town, Grand Cayman, CAYMAN ISLANDS KY	Tax year of foreign corporation, PFIC, or QEF: or other tax year beginning	Calendar year 2023	
	_	•	and ending	, ,	
Р	art I	Summary of Annual Information (see instructions)			
Prov	/ide the	following information with respect to all shares of the PFIC held by the shareholder:			
1	Desc	cription of each class of shares held by the shareholder: Common Stock			
		Check if shares jointly owned with spouse.			
2	Date	shares acquired during the tax year, if applicable:			
3	Num	ber of shares held at the end of the tax year:			
	Volu	a of abarra hald at the and of the tay year (aback the appropriate boy, if applicable):			
4		e of shares held at the end of the tax year (check the appropriate box, if applicable): $X$ \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000	( <b>d</b> ) \$150,001-200,000		
	. ,	If more than \$200,000, list value:	( <b>u</b> ) \$130,301 200,000		
	(0)				
5	Type	e of PFIC and amount of any excess distribution or gain treated as an excess distribution ur	der section 1291, inclusion under section 129	3,	
	and i	inclusion or deduction under section 1296 (check all boxes that apply):			
	(a)	Section 1291 \$			
	(b)	Section 1293 (Qualified Electing Fund) \$			
_	(c)	Section 1296 (Mark to Market) \$	See Statem	ent 42	
<u>P</u>		Elections (see instructions)			
Α		Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as	,		
В	Ш	Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend to of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you ma 1294(c) and 1294(f) and the related regulations for events that terminate this election.	calculate the tax that may be deferred.	earnings and profits	
С		<b>Election To Mark-to-Market PFIC Stock</b> . I, a shareholder of a PFIC, elect to mark-to-mark 1296(e). Complete Part IV.	eet the PFIC stock that is marketable within the	meaning of section	
D		<b>Deemed Sale Election.</b> I, a shareholder on the first day of a PFIC's first tax year as a QEF PFIC. Enter gain or loss on line 15f of Part V.	, elect to recognize gain on the deemed sale of	my interest in the	
Ε		<b>Deemed Dividend Election</b> . I, a shareholder on the first day of a PFIC's first tax year as a amount equal to my share of the post-1986 earnings and profits of the CFC as an excess excess distribution is greater than zero, also complete line 16 of Part V.	• • • • • • • • • • • • • • • • • • • •	,,	
_		, ,	DEIO L. L. L. L. 1007/11		
F	Ш	<b>Election To Recognize Gain on Deemed Sale of PFIC.</b> I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.			
G		<b>Deemed Dividend Election With Respect to a Section 1297(e) PFIC.</b> I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). E distribution is greater than zero, also complete line 16, Part V.	) PFIC. My holding period in the stock of the Sinter the excess distribution on line 15e, F	ection 1297(e) Part V. If the excess	
Н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16. Part V	iod in the stock of the former PFIC includes the	e termination date, as	

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making					
	Election B, also complete lines 8a through 9c. See instructions.					
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a				
b	Enter the portion of line 6a that is included in income under section 951 or that may be					
	excluded under section 1293(g)	6b				
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c		
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a				
b	Enter the portion of line 7a that is included in income under section 951 or that may be					
	excluded under section 1293(g)	7b				
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun					
	used for your income tax return. See instructions			7c		
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.			
8 a	Add lines 6c and 7c			8a		
b	Enter the total amount of cash and the fair market value of other property distributed					
	or deemed distributed to you during the tax year of the QEF. See instructions	8b				
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares					
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c				
d	Add lines 8b and 8c			8d		
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e		
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,			
	you may make Election B with respect to the amount on line 8e.	1 .	i.			
	Enter the total tax for the tax year. See instructions	9a		4		
b	Enter the total tax for the tax year determined without regard to the amount entered	١				
	on line 8e	9b	<u> </u>	4		
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making			
D	Election B		ional	9c		
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>	
	Enter the fair market value of your PFIC stock at the end of the tax year			10a		
				10b		
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of the last restriction of the last restriction of the last restriction.		-	۱.,		
	on your tax return. If a loss, go to line 11			10c		
	Enter any unreversed inclusions (as defined in section 1296(d))			11		
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0		
10	loss on your tax return			12		
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the Enter the fair market value of the stock on the date of sale or disposition	-		13a		
				13b		
			income on your	130		
·	c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your tax return. If a loss, go to line 14			13c		
1 <b>4</b> 2	- · · · · · · · · · · · · · · · · · · ·			14a		
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·		
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b		
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I					
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c		
	Note: See instructions in case of multiple sales or dispositions.					

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c **d** Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Name of shareholder			Identifying number (see instructions)			
Ne	w H	ampshire Charitable Foundation	02-6005625			
Num	ber, sti	reet, and room or suite no. If a P.O. box, see instructions.	Shareholder tax year: calendar year 2023 or other tax year beginning			
		easant Street	, and ending , .			
		n, state, and ZIP code or country rd, NH 03301–4005				
			nership S Corporation Nongrantor Trust Estate			
		y Excepted Specified Foreign Financial Assets are reported on this form. See instruct				
Qual	ifying l	nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elec	ct to treat such stock as the stock of a Qualifying			
		Corporation under the alternative facts and circumstances test within the meaning of	<u>r</u>			
		gn corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)	Employer identification number (if any)			
Ua	KSU	ar Cargo Opportunities SARL	98-1617496			
Add	ress (Er	nter number, street, city or town, and country.)	Reference ID number (see instructions)			
	(	······································	,			
		oulevard Royal	Tax year of foreign corporation, PFIC, or QEF: Calendar year 2023			
Lu	xem	bourg, LUXEMBOURG L-2449	or other tax year beginning ,			
_			and ending , .			
	art I	Summary of Annual Information (see instructions)				
		following information with respect to all shares of the PFIC held by the shareholder:				
1	Desc	cription of each class of shares held by the shareholder: Common Stock	•			
2	L Data	Check if shares jointly owned with spouse. shares acquired during the tax year, if applicable:				
_	Date	Shares acquired during the tax year, if applicable.				
3	Num	ber of shares held at the end of the tax year:				
4		e of shares held at the end of the tax year (check the appropriate box, if applicable):	000 (4)			
	` '	X \$0-50,000 <b>(b)</b> \$50,001-100,000 <b>(c)</b> \$100,001-150,001 fmore than \$200,000, list value:	000 <b>(d)</b> \$150,001-200,000			
	(6)	ii iiiote tilali \$200,000, list value.				
5	Type	e of PFIC and amount of any excess distribution or gain treated as an excess distribu	tion under section 1291, inclusion under section 1293,			
		inclusion or deduction under section 1296 (check all boxes that apply):				
	(a)	Section 1291 \$				
	(b)	Section 1293 (Qualified Electing Fund) \$				
_	(c)	Section 1296 (Mark to Market) \$	See Statement 43			
_	art II	Elections (see instructions)	510 055 0 44 1/2 0 1/4 4 7 4 7 4 7 4 7 4 7 4 7 4 7 4 7 4 7 4			
A B	H	Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PI	, , , , , , , , , , , , , , , , , , , ,			
Ь		Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to ex of the QEF until this election is terminated. Complete lines 8a through 9c of Pai Note: If any portion of line 6a or line 7a of Part III is includible under section 951, yr 1294(c) and 1294(f) and the related regulations for events that terminate this election.	rt III to calculate the tax that may be deferred. ou may <b>not</b> make this election. Also, see sections			
С		Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-1296(e). Complete Part IV.				
D		Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as	a QEF, elect to recognize gain on the deemed sale of my interest in the			
_		PFIC. Enter gain or loss on line 15f of Part V.	and a OFF that is a controlled foreign accompation (OFO), elect to treat an			
Ε	ш	<b>Deemed Dividend Election.</b> I, a shareholder on the first day of a PFIC's first tax yea amount equal to my share of the post-1986 earnings and profits of the CFC as an e	• • • • • • • • • • • • • • • • • • • •			
		excess distribution is greater than zero, also complete line 16 of Part V.				
F		Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former	PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess			
		distribution the gain recognized on the deemed sale of my interest in the PFIC on the gain on line 15f of Part V.	ne last day of its last tax year as a PFIC under section 1297(a). Enter			
G		Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a sharehol	der of a section 1297(e) PFIC, within the meaning of Regulations section			
J		1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1.1297-3 includes the CFC qualification date, as defined in Regulations section 1.1297-3	1297(e) PFIC. My holding period in the stock of the Section 1297(e)			
		distribution is greater than zero, also complete line 16, Part V.				
Н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a felect to make a deemed dividend election with respect to the former PFIC. My holdi	ormer PFIC, within the meaning of Regulations section 1.1298-3(a),			
		defined in Regulations section 1.1298-3(d). Enter the excess distribution on lin complete line 16, Part V.	e 15e, Part V. If the excess distribution is greater than zero, also			

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making					
	Election B, also complete lines 8a through 9c. See instructions.					
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a				
b	Enter the portion of line 6a that is included in income under section 951 or that may be					
	excluded under section 1293(g)	6b				
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c		
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a				
b	Enter the portion of line 7a that is included in income under section 951 or that may be					
	excluded under section 1293(g)	7b				
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun					
	used for your income tax return. See instructions			7c		
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.			
8 a	Add lines 6c and 7c			8a		
b	Enter the total amount of cash and the fair market value of other property distributed					
	or deemed distributed to you during the tax year of the QEF. See instructions	8b				
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares					
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c				
d	Add lines 8b and 8c			8d		
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e		
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,			
	you may make Election B with respect to the amount on line 8e.	1 .	i.			
	Enter the total tax for the tax year. See instructions	9a		4		
b	Enter the total tax for the tax year determined without regard to the amount entered	١				
	on line 8e	9b	<u> </u>	4		
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making			
D	Election B		ional	9c		
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>	
	Enter the fair market value of your PFIC stock at the end of the tax year			10a		
				10b		
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of the last restriction of the last restriction of the last restriction.		-	۱.,		
	on your tax return. If a loss, go to line 11			10c		
	Enter any unreversed inclusions (as defined in section 1296(d))			11		
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0		
10	loss on your tax return			12		
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the Enter the fair market value of the stock on the date of sale or disposition	-		13a		
				13b		
			income on your	130		
·	c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your tax return. If a loss, go to line 14			13c		
1 <b>4</b> 2	- · · · · · · · · · · · · · · · · · · ·			14a		
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·		
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b		
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I					
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c		
	Note: See instructions in case of multiple sales or dispositions.					

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c **d** Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Name of shareholder			Identifying number (see instructions)		
Ne	w H	ampshire Charitable Foundation	02-6005625		
Num	ber, st	reet, and room or suite no. If a P.O. box, see instructions. easant Street	Shareholder tax year: calendar year 2023 or other tax year beginning , and ending ,		
		n, state, and ZIP code or country rd, NH 03301-4005			
		of shareholder filing the return: Individual X Corporation Partnersl	hip S Corporation Nongrantor Trust Estate		
Che	ck if any	y Excepted Specified Foreign Financial Assets are reported on this form. See instructions			
		nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to			
		Corporation under the alternative facts and circumstances test within the meaning of secti			
		gn corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) ${f r} \;\; {f RE} \;\; {f V} \;\; {f LTD}$	Employer identification number (if any)		
Addı	ress (Ei	nter number, street, city or town, and country.)	Reference ID number (see instructions) U60		
45	Re	id Street	Tax year of foreign corporation, PFIC, or QEF: Calendar year 202		
На	mi1	ton, BERMUDA 12 BD	or other tax year beginning ,		
			and ending , .		
	art I	Summary of Annual Information (see instructions)			
		following information with respect to all shares of the PFIC held by the shareholder:			
1	Desc	cription of each class of shares held by the shareholder: Common Stock			
		Check if shares jointly owned with spouse.			
2	Date	shares acquired during the tax year, if applicable:			
3	Num	ber of shares held at the end of the tax year:			
	V-1				
4		e of shares held at the end of the tax year (check the appropriate box, if applicable): $X$ \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000	(4) \$\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \		
	٠,		(d) \$150,001-200,000		
	(6)	If more than \$200,000, list value:			
5	Type	e of PFIC and amount of any excess distribution or gain treated as an excess distribution (	under section 1291, inclusion under section 1293		
·		inclusion or deduction under section 1296 (check all boxes that apply):			
	(a)	Section 1291 \$			
	(b)	Section 1293 (Qualified Electing Fund) \$			
	(c)	Section 1296 (Mark to Market) \$	See Statement 44		
P	_ , ,	Elections (see instructions)			
A		Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC a	s a QEF. Complete lines 6a through 7c of Part III.		
В		Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend of the QEF until this election is terminated. <i>Complete lines 8a through 9c of Part III</i> Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you m 1294(c) and 1294(f) and the related regulations for events that terminate this election.	to calculate the tax that may be deferred.		
С		<b>Election To Mark-to-Market PFIC Stock</b> . I, a shareholder of a PFIC, elect to mark-to-ma 1296(e). <i>Complete Part IV</i> .	rket the PFIC stock that is marketable within the meaning of section		
D		<b>Deemed Sale Election</b> . I, a shareholder on the first day of a PFIC's first tax year as a QE PFIC. <i>Enter gain or loss on line 15f of Part V.</i>	F, elect to recognize gain on the deemed sale of my interest in the		
E		<b>Deemed Dividend Election.</b> I, a shareholder on the first day of a PFIC's first tax year as amount equal to my share of the post-1986 earnings and profits of the CFC as an excess excess distribution is greater than zero, also complete line 16 of Part V.	• • • • • • • • • • • • • • • • • • • •		
F		<b>Election To Recognize Gain on Deemed Sale of PFIC.</b> I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.			
G		Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297 PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). distribution is greater than zero, also complete line 16, Part V.	(e) PFIC. My holding period in the stock of the Section 1297(e)		
н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 complete line 16. Part V	eriod in the stock of the former PFIC includes the termination date, as		

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making					
	Election B, also complete lines 8a through 9c. See instructions.					
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a				
b	Enter the portion of line 6a that is included in income under section 951 or that may be					
	excluded under section 1293(g)	6b				
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c		
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a				
b	Enter the portion of line 7a that is included in income under section 951 or that may be					
	excluded under section 1293(g)	7b				
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun					
	used for your income tax return. See instructions			7c		
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.			
8 a	Add lines 6c and 7c			8a		
b	Enter the total amount of cash and the fair market value of other property distributed					
	or deemed distributed to you during the tax year of the QEF. See instructions	8b				
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares					
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c				
d	Add lines 8b and 8c			8d		
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e		
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,			
	you may make Election B with respect to the amount on line 8e.	1 .	i.			
	Enter the total tax for the tax year. See instructions	9a		4		
b	Enter the total tax for the tax year determined without regard to the amount entered	١				
	on line 8e	9b	<u> </u>	4		
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making			
D	Election B		ional	9c		
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>	
	Enter the fair market value of your PFIC stock at the end of the tax year			10a		
				10b		
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of the last restriction of the last restriction of the last restriction.		-	۱.,		
	on your tax return. If a loss, go to line 11			10c		
	Enter any unreversed inclusions (as defined in section 1296(d))			11		
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0		
10	loss on your tax return			12		
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the Enter the fair market value of the stock on the date of sale or disposition	-		13a		
				13b		
			income on your	130		
·	c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your tax return. If a loss, go to line 14			13c		
1 <b>4</b> 2	- · · · · · · · · · · · · · · · · · · ·			14a		
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·		
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b		
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I					
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c		
	Note: See instructions in case of multiple sales or dispositions.					

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c **d** Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Nam	ne of sh	areholder	Identifying number (see instructions)
Ne	w H	ampshire Charitable Foundation	02-6005625
		reet, and room or suite no. If a P.O. box, see instructions.	Shareholder tax year: calendar year 2023 or other tax year beginning
37	P1	easant Street	, and ending ,
		n, state, and ZIP code or country rd, NH 03301–4005	
		of shareholder filing the return: Individual X Corporation Partnershi	S Corporation Nongrantor Trust Estate
		y Excepted Specified Foreign Financial Assets are reported on this form. See instructions .	
		nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to tr	
Insu	rance (	Corporation under the alternative facts and circumstances test within the meaning of sectio	
		gn corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) ${f n}$ ${f Bridge}$ ${f 2}$ ${f PCC}$ ${f LTD}$	Employer identification number (if any)
Add	ress (Ei	nter number, street, city or town, and country.)	Reference ID number (see instructions) U60
1	Bar	tholowmew Lane	Tax year of foreign corporation, PFIC, or QEF: Calendar year 2023
Lo	ndo	n, UNITED KINGDOM EC2N 2AX	or other tax year beginning ,
_			and ending , .
	art I	Summary of Annual Information (see instructions)	
Pro۱		following information with respect to all shares of the PFIC held by the shareholder:	
1	Desc	cription of each class of shares held by the shareholder: Common Stock	
•	Doto	Check if shares jointly owned with spouse.	
2	Date	shares acquired during the tax year, if applicable:	
3	Num	ber of shares held at the end of the tax year:	
	Valu		
4		e of shares held at the end of the tax year (check the appropriate box, if applicable): $X$ \$0-50,000 (b) $S$ 50,001-100,000 (c) $S$ 100,001-150,000	(d) \$150,001-200,000
	٠,	If more than \$200,000, list value:	
	(0)		
5	Type	e of PFIC and amount of any excess distribution or gain treated as an excess distribution ur	nder section 1291, inclusion under section 1293,
		inclusion or deduction under section 1296 (check all boxes that apply):	
	(a)	Section 1291 \$	
	(b)	Section 1293 (Qualified Electing Fund) \$	
	(c)	Section 1296 (Mark to Market) \$	See Statement 45
P	art II		
Α		Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as	
В		Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend to of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you ma 1294(c) and 1294(f) and the related regulations for events that terminate this election.	o calculate the tax that may be deferred.
С		<b>Election To Mark-to-Market PFIC Stock</b> . I, a shareholder of a PFIC, elect to mark-to-mark 1296(e). <i>Complete Part IV</i> .	ket the PFIC stock that is marketable within the meaning of section
D		<b>Deemed Sale Election</b> . I, a shareholder on the first day of a PFIC's first tax year as a QEF PFIC. <i>Enter gain or loss on line 15f of Part V.</i>	, elect to recognize gain on the deemed sale of my interest in the
E		<b>Deemed Dividend Election.</b> I, a shareholder on the first day of a PFIC's first tax year as a amount equal to my share of the post-1986 earnings and profits of the CFC as an excess excess distribution is greater than zero, also complete line 16 of Part V.	
_		, , , , , , , , , , , , , , , , , , , ,	or a DEIC to which coation 1007/d\ annilling alcot to treat a result.
F		<b>Election To Recognize Gain on Deemed Sale of PFIC.</b> I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.	
G		Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Edistribution is greater than zero, also complete line 16, Part V.	e) PFIC. My holding period in the stock of the Section 1297(e)
Н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16, Part V.	riod in the stock of the former PFIC includes the termination date, as

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making					
	Election B, also complete lines 8a through 9c. See instructions.					
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a				
b	Enter the portion of line 6a that is included in income under section 951 or that may be					
	excluded under section 1293(g)	6b				
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c		
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a				
b	Enter the portion of line 7a that is included in income under section 951 or that may be					
	excluded under section 1293(g)	7b				
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun					
	used for your income tax return. See instructions			7c		
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.			
8 a	Add lines 6c and 7c			8a		
b	Enter the total amount of cash and the fair market value of other property distributed					
	or deemed distributed to you during the tax year of the QEF. See instructions	8b				
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares					
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c				
d	Add lines 8b and 8c			8d		
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e		
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,			
	you may make Election B with respect to the amount on line 8e.	1 .	i.			
	Enter the total tax for the tax year. See instructions	9a		4		
b	Enter the total tax for the tax year determined without regard to the amount entered	١				
	on line 8e	9b	<u> </u>	4		
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making			
D	Election B		ional	9c		
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>	
	Enter the fair market value of your PFIC stock at the end of the tax year			10a		
				10b		
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of the last restriction of the last restriction of the last restriction.		-	۱.,		
	on your tax return. If a loss, go to line 11			10c		
	Enter any unreversed inclusions (as defined in section 1296(d))			11		
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0		
10	loss on your tax return			12		
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the Enter the fair market value of the stock on the date of sale or disposition	-		13a		
				13b		
			income on your	130		
·	c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your tax return. If a loss, go to line 14			13c		
1 <b>4</b> 2	- · · · · · · · · · · · · · · · · · · ·			14a		
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·		
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b		
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I					
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c		
	Note: See instructions in case of multiple sales or dispositions.					

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c **d** Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Name of s	shareholder	Identifying number (see instructions)
New :	Hampshire Charitable Foundation	02-6005625
Number,	street, and room or suite no. If a P.O. box, see instructions.  leasant Street	Shareholder tax year: calendar year 2023 or other tax year beginning
	wn, state, and ZIP code or country	, and ending , .
	ord, NH 03301-4005	
	e of shareholder filing the return: Individual X Corporation Partnershi	
	ny Excepted Specified Foreign Financial Assets are reported on this form. See instructions	
	Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to tree Corporation under the alternative facts and circumstances test within the meaning of section	
	reign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)	Employer identification number (if any)
	tah Master Fund LTD	(,,
		98-1693267
Address (	Enter number, street, city or town, and country.)	Reference ID number (see instructions)
21 77	ictoria Street	7023
	Hamilton, BERMUDA HM10	Tax year of foreign corporation, PFIC, or QEF: Calendar year 2023
West	Hamilton, DERMODA HMIO	or other tax year beginning , and ending , .
Part	Summary of Annual Information (see instructions)	, .
Provide tl	ne following information with respect to all shares of the PFIC held by the shareholder:	
<b>1</b> De	scription of each class of shares held by the shareholder: Common Stock	
	Check if shares jointly owned with spouse.	
<b>2</b> Da	te shares acquired during the tax year, if applicable:	
<b>3</b> Nu	mber of shares held at the end of the tax year:	
<b>4</b> Va	lue of shares held at the end of the tax year (check the appropriate box, if applicable):	
	X \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000	( <b>d</b> ) \$150,001-200,000
•	If more than \$200,000, list value:	(1) ψ100,001 200,000
•		
<b>5</b> Ty	pe of PFIC and amount of any excess distribution or gain treated as an excess distribution un	nder section 1291, inclusion under section 1293,
an	d inclusion or deduction under section 1296 (check all boxes that apply):	
(a		
(b)		Goo Ghohomanh 16
(c) Part		See Statement 46
A	Elections (see instructions)  Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as	a DEE Complete lines 6a through 7c of Part III
B	Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend t	
	of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you ma	o calculate the tax that may be deferred.
	1294(c) and 1294(f) and the related regulations for events that terminate this election.	
C L	Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-mark	ket the PFIC stock that is marketable within the meaning of section
D $\square$	1296(e). Complete Part IV.  Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF	alact to recognize gain on the deemed cale of my interact in the
	PFIC. Enter gain or loss on line 15f of Part V.	, elect to recognize gain on the deemed sale of my interest in the
E	Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a	QEF that is a controlled foreign corporation (CFC), elect to treat an
	amount equal to my share of the post-1986 earnings and profits of the CFC as an excess	distribution. Enter this amount on line 15e of Part V. If the
	excess distribution is greater than zero, also complete line 16 of Part V.	
F L	Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC	
	distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.	uay ui iis iast tax year as a ffio uiluer section 1297(a). Enter
<u> </u>	Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of	a section 1297(e) PFIC, within the meaning of Regulations section
G ∟	1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e	e) PFIC. My holding period in the stock of the Section 1297(e)
	PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). E distribution is greater than zero, also complete line 16, Part V.	ther the excess distribution on line 15e, Part V. If the excess
н 🗀	Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former	PFIC, within the meaning of Regulations section 1.1298-3(a),
	delect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e	
	complete line 16, Part V.	,

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making					
	Election B, also complete lines 8a through 9c. See instructions.					
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a				
b	Enter the portion of line 6a that is included in income under section 951 or that may be					
	excluded under section 1293(g)	6b				
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c		
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a				
b	Enter the portion of line 7a that is included in income under section 951 or that may be					
	excluded under section 1293(g)	7b				
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun					
	used for your income tax return. See instructions			7c		
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.			
8 a	Add lines 6c and 7c			8a		
b	Enter the total amount of cash and the fair market value of other property distributed					
	or deemed distributed to you during the tax year of the QEF. See instructions	8b				
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares					
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c				
d	Add lines 8b and 8c			8d		
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e		
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,			
	you may make Election B with respect to the amount on line 8e.	1 .	i.			
	Enter the total tax for the tax year. See instructions	9a		4		
b	Enter the total tax for the tax year determined without regard to the amount entered	١				
	on line 8e	9b	<u> </u>	4		
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making			
D	Election B		ional	9c		
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>	
	Enter the fair market value of your PFIC stock at the end of the tax year			10a		
				10b		
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of the last restriction of the last restriction of the last restriction.		-	۱.,		
	on your tax return. If a loss, go to line 11			10c		
	Enter any unreversed inclusions (as defined in section 1296(d))			11		
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0		
10	loss on your tax return			12		
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the Enter the fair market value of the stock on the date of sale or disposition	-		13a		
				13b		
			income on your	130		
·	c Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your tax return. If a loss, go to line 14			13c		
1 <b>4</b> 2	- · · · · · · · · · · · · · · · · · · ·			14a		
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·		
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b		
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I					
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c		
	Note: See instructions in case of multiple sales or dispositions.					

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c **d** Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Name of shareholder			Identifying number (see instructions)				
Ne	w H	ampshire Charitable Foundation	02-6005625				
		reet, and room or suite no. If a P.O. box, see instructions.  easant Street	Shareholder tax year: calendar year $2023$ or other tax year beginning , and ending ,				
City	or towr	n, state, and ZIP code or country rd, NH 03301-4005					
		of shareholder filing the return: Individual X Corporation Partnershi	p S Corporation Nongrantor Trust Estate				
Chec	ck if any	y Excepted Specified Foreign Financial Assets are reported on this form. See instructions .					
		nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to tr					
		Corporation under the alternative facts and circumstances test within the meaning of section					
India FPI XI Holdings Singapore PTE LTD			Employer identification number (if any)  98-1553824				
Λdd	roce (E	nter number, street, city or town, and country.)	Reference ID number (see instructions)				
Auui	622 (EI	inter number, sheet, city of town, and country.)	Neterence to humber (see mistractions)				
80 Raffles Place #51-03 Republic Plaza, Singapore, SINGAPORE 048624			Tax year of foreign corporation, PFIC, or QEF: Calendar year 2 0 2 3 or other tax year beginning , and ending ,				
	art I	Summary of Annual Information (see instructions)					
		rollowing information with respect to all shares of the PFIC held by the shareholder: cription of each class of shares held by the shareholder: Common Stock  Check if shares jointly owned with spouse.					
2	Date	shares acquired during the tax year, if applicable:					
3	Num	ber of shares held at the end of the tax year:					
4	4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):  (a) X \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000 (d) \$150,001-200,000  (e) If more than \$200,000, list value:						
5		e of PFIC and amount of any excess distribution or gain treated as an excess distribution un inclusion or deduction under section 1296 (check all boxes that apply):  Section 1291 \$	nder section 1291, inclusion under section 1293,				
	(a) (b)	Section 1293 (Qualified Electing Fund) \$					
	(c)	Section 1296 (Mark to Market) \$	See Statement 47				
Р		Elections (see instructions)					
A		Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as	a QEF. Complete lines 6a through 7c of Part III.				
В		Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.  Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.					
С		<b>Election To Mark-to-Market PFIC Stock</b> . I, a shareholder of a PFIC, elect to mark-to-mark 1296(e). Complete Part IV.	ket the PFIC stock that is marketable within the meaning of section				
D		<b>Deemed Sale Election.</b> I, a shareholder on the first day of a PFIC's first tax year as a QEF PFIC. Enter gain or loss on line 15f of Part V.	, elect to recognize gain on the deemed sale of my interest in the				
Ε		Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part V.					
F		<b>Election To Recognize Gain on Deemed Sale of PFIC.</b> I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.					
G		Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). E distribution is greater than zero, also complete line 16, Part V.	e) PFIC. My holding period in the stock of the Section 1297(e) Enter the excess distribution on line 15e, Part V. If the excess				
Н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16. Part V	riod in the stock of the former PFIC includes the termination date, as				

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making						
Election B, also complete lines 8a through 9c. See instructions.							
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a					
b	Enter the portion of line 6a that is included in income under section 951 or that may be	Enter the portion of line 6a that is included in income under section 951 or that may be					
	excluded under section 1293(g) 6b						
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c			
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a					
b	Enter the portion of line 7a that is included in income under section 951 or that may be						
	excluded under section 1293(g)	7b					
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun						
	used for your income tax return. See instructions			7c			
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.				
8 a	Add lines 6c and 7c		 I	8a			
b	Enter the total amount of cash and the fair market value of other property distributed						
	or deemed distributed to you during the tax year of the QEF. See instructions	8b					
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares						
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c					
d	Add lines 8b and 8c			8d			
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e			
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,				
	you may make Election B with respect to the amount on line 8e.	1 .	I				
	Enter the total tax for the tax year. See instructions	9a		_			
b	Enter the total tax for the tax year determined without regard to the amount entered	l					
	on line 8e	9b		_			
c Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is extended by making							
D	Election B		ianal	9c			
	art IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>		
	Enter the fair market value of your PFIC stock at the end of the tax year			10a			
				10b			
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the least set of the last		-	40.			
	on your tax return. If a loss, go to line 11			10c			
	Enter any unreversed inclusions (as defined in section 1296(d))			11			
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			10			
loss on your tax return 12							
	3 If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:						
	Enter the fair market value of the stock on the date of sale or disposition			13a 13b			
	Enter the adjusted basis of the stock on the date of sale or disposition Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your			100			
·				13c			
142	tax return. If a loss, go to line 14 Enter any unreversed inclusions (as defined in section 1296(d))			14a			
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- ""			
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b			
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I						
	return according to the rules generally applicable for losses provided elsewhere in the Code and regulations			14c			
	Note: See instructions in case of multiple sales or dispositions.						

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c **d** Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Name of shareholder			Identifying number (see instructions)				
Ne	w H	ampshire Charitable Foundation	02-6005625				
		reet, and room or suite no. If a P.O. box, see instructions. easant Street	Shareholder tax year: calendar year 2023 or other tax year beginning and ending				
		n, state, and ZIP code or country rd, NH 03301-4005					
		of shareholder filing the return: Individual X Corporation Partnersh	ip S Corporation Nongrantor Trust Estate				
		y Excepted Specified Foreign Financial Assets are reported on this form. See instructions					
		nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to to					
Insu	rance C	Corporation under the alternative facts and circumstances test within the meaning of section	on 1297(f)(2). See instructions				
		gn corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) 2021–1 Holdings Designated	Employer identification number (if any)				
		ity Company	98-1625367				
		nter number, street, city or town, and country.)	Reference ID number (see instructions)				
Rocktwist House Block 1 W. Business Park Shannon, IRELAND			Tax year of foreign corporation, PFIC, or QEF: Calendar year 2 0 2 3 or other tax year beginning , and ending , .				
	art I	Summary of Annual Information (see instructions)					
		following information with respect to all shares of the PFIC held by the shareholder:					
1	Desc	cription of each class of shares held by the shareholder: Common Stock					
2	Data	☐ Check if shares jointly owned with spouse.  shares acquired during the tax year, if applicable:					
_	Date	Shales acquired during the tax year, if applicable.					
3	Num	ber of shares held at the end of the tax year:					
	Volu	a of abarea hald at the and of the tay year (aback the appropriate her) if applicable):					
4		e of shares held at the end of the tax year (check the appropriate box, if applicable): $X$ \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000	(d) \$150,001-200,000				
	٠,	If more than \$200,000, list value:	(u)				
	(0)						
5	Type	Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293,					
		inclusion or deduction under section 1296 (check all boxes that apply):	,				
	(a)	Section 1291 \$					
	(b)	Section 1293 (Qualified Electing Fund) \$					
	(c)	Section 1296 (Mark to Market) \$	See Statement 48				
Р		Elections (see instructions)					
Α	$\vdash$	Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as					
В		Lection To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.  Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.					
С		Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-mar 1296(e). Complete Part IV.	ket the PFIC stock that is marketable within the meaning of section				
D		<b>Deemed Sale Election.</b> I, a shareholder on the first day of a PFIC's first tax year as a QEI PFIC. Enter gain or loss on line 15f of Part V.	e, elect to recognize gain on the deemed sale of my interest in the				
Ε		<b>Deemed Dividend Election.</b> I, a shareholder on the first day of a PFIC's first tax year as a amount equal to my share of the post-1986 earnings and profits of the CFC as an excess	• • • • • • • • • • • • • • • • • • • •				
		excess distribution is greater than zero, also complete line 16 of Part V.					
F		<b>Election To Recognize Gain on Deemed Sale of PFIC.</b> I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.					
G		Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). I distribution is greater than zero, also complete line 16, Part V.	e) PFIC. My holding period in the stock of the Section 1297(e)				
н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding pe defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 150 complete line 16 Part V	riod in the stock of the former PFIC includes the termination date, as				

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making						
Election B, also complete lines 8a through 9c. See instructions.							
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a					
b	Enter the portion of line 6a that is included in income under section 951 or that may be	Enter the portion of line 6a that is included in income under section 951 or that may be					
	excluded under section 1293(g) 6b						
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c			
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a					
b	Enter the portion of line 7a that is included in income under section 951 or that may be						
	excluded under section 1293(g)	7b					
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun						
	used for your income tax return. See instructions			7c			
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.				
8 a	Add lines 6c and 7c		 I	8a			
b	Enter the total amount of cash and the fair market value of other property distributed						
	or deemed distributed to you during the tax year of the QEF. See instructions	8b					
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares						
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c					
d	Add lines 8b and 8c			8d			
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e			
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,				
	you may make Election B with respect to the amount on line 8e.	1 .	I				
	Enter the total tax for the tax year. See instructions	9a		_			
b	Enter the total tax for the tax year determined without regard to the amount entered	l					
	on line 8e	9b		_			
c Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is extended by making							
D	Election B		ianal	9c			
	art IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>		
	Enter the fair market value of your PFIC stock at the end of the tax year			10a			
				10b			
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the least set of the last		-	40.			
	on your tax return. If a loss, go to line 11			10c			
	Enter any unreversed inclusions (as defined in section 1296(d))			11			
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			10			
loss on your tax return 12							
	3 If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:						
	Enter the fair market value of the stock on the date of sale or disposition			13a 13b			
	Enter the adjusted basis of the stock on the date of sale or disposition Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your			100			
·				13c			
142	tax return. If a loss, go to line 14 Enter any unreversed inclusions (as defined in section 1296(d))			14a			
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- ""			
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b			
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I						
	return according to the rules generally applicable for losses provided elsewhere in the Code and regulations			14c			
	Note: See instructions in case of multiple sales or dispositions.						

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c **d** Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

## Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Name of shareholder			Identifying number (see instructions)				
Ne	w H	ampshire Charitable Foundation	02-6005625				
Number, street, and room or suite no. If a P.O. box, see instructions.			Shareholder tax year: calendar year 2023 or other tax year beginning				
		easant Street	, and ending ,				
		n, state, and ZIP code or country rd, NH 03301–4005					
Che	ck type	of shareholder filing the return: Individual X Corporation Partnershi	p S Corporation Nongrantor Trust Estate				
		y Excepted Specified Foreign Financial Assets are reported on this form. See instructions .					
		nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to tr					
	Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions						
Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)  Oaktree Maritime Finance Holdings 10B LTD  Employer identification number (if any)							
			98-1497352				
Add	ress (Ei	nter number, street, city or town, and country.)	Reference ID number (see instructions)				
19	0 E	lgin Avenue	Tax year of foreign corporation, PFIC, or QEF: Calendar year 202				
		e Town, Grand Cayman, CAYMAN ISLANDS KY	or other tax year beginning , and ending				
Р	art I	Summary of Annual Information (see instructions)	and ending , .				
		following information with respect to all shares of the PFIC held by the shareholder:					
1		cription of each class of shares held by the shareholder: Common Stock					
		Check if shares jointly owned with spouse.					
2	Date	shares acquired during the tax year, if applicable:					
3	Num	iber of shares held at the end of the tax year:					
4		e of shares held at the end of the tax year (check the appropriate box, if applicable):					
	٠,	X \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000	(d) \$150,001-200,000				
	(e)	If more than \$200,000, list value:					
5	Type	pe of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293,					
J		inclusion or deduction under section 1296 (check all boxes that apply):	idel Section 1231, inclusion and a Section 1230,				
	(a)	Section 1291 \$					
	(b)	Section 1293 (Qualified Electing Fund) \$					
	(c)	Section 1296 (Mark to Market) \$	See Statement 49				
P	art II						
Α		Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as	a QEF. Complete lines 6a through 7c of Part III.				
В		Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.  Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.					
С		Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.					
D		<b>Deemed Sale Election</b> . I, a shareholder on the first day of a PFIC's first tax year as a QEF PFIC. Enter gain or loss on line 15f of Part V.	, elect to recognize gain on the deemed sale of my interest in the				
Ε		Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a					
		amount equal to my share of the post-1986 earnings and profits of the CFC as an excess excess distribution is greater than zero, also complete line 16 of Part V.	distribution. Enter this amount on line 15e of Part V. If the				
F		<b>Election To Recognize Gain on Deemed Sale of PFIC.</b> I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last $gain\ on\ line\ 15f\ of\ Part\ V.$					
G		Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Edistribution is greater than zero, also complete line 16, Part V.	) PFIC. My holding period in the stock of the Section 1297(e)				
Н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16, Part V.	iod in the stock of the former PFIC includes the termination date, as				

Pá	Part III Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 6a through 7c. If you are making						
Election B, also complete lines 8a through 9c. See instructions.							
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a					
b	Enter the portion of line 6a that is included in income under section 951 or that may be	Enter the portion of line 6a that is included in income under section 951 or that may be					
	excluded under section 1293(g) 6b						
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c			
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a					
b	Enter the portion of line 7a that is included in income under section 951 or that may be						
	excluded under section 1293(g)	7b					
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun						
	used for your income tax return. See instructions			7c			
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.				
8 a	Add lines 6c and 7c		 I	8a			
b	Enter the total amount of cash and the fair market value of other property distributed						
	or deemed distributed to you during the tax year of the QEF. See instructions	8b					
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares						
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	8c					
d	Add lines 8b and 8c			8d			
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack	cets)		8e			
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,				
	you may make Election B with respect to the amount on line 8e.	1 .	I				
	Enter the total tax for the tax year. See instructions	9a		_			
b	Enter the total tax for the tax year determined without regard to the amount entered	l					
	on line 8e	9b		_			
c Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is extended by making							
D	Election B		ianal	9c			
	art IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>		
	Enter the fair market value of your PFIC stock at the end of the tax year			10a			
				10b			
C	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the least set of the last		-	40.			
	on your tax return. If a loss, go to line 11			10c			
	Enter any unreversed inclusions (as defined in section 1296(d))			11			
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			10			
loss on your tax return 12							
	3 If you sold or otherwise disposed of any section 1296 stock (see instructions) during the tax year:						
	Enter the fair market value of the stock on the date of sale or disposition			13a 13b			
	Enter the adjusted basis of the stock on the date of sale or disposition Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as ordinary income on your			100			
·				13c			
142	tax return. If a loss, go to line 14 Enter any unreversed inclusions (as defined in section 1296(d))			14a			
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- ""			
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b			
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I						
	return according to the rules generally applicable for losses provided elsewhere in the Code and regulations			14c			
	Note: See instructions in case of multiple sales or dispositions.						

#### Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Part V Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c **d** Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the current tax year. 25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19

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26 Interest accrued after partial termination of election. Subtract line 24 from line 20

# (Rev. December 2018) Department of the Treasury Internal Revenue Service

# Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Attachment Sequence No. **69** 

Name of shareholder	Identifying number (see instructions)							
New Hampshire Charitable Foundation	02-6005625							
Number, street, and room or suite no. If a P.O. box, see instructions.	Shareholder tax year: calendar year 2023 or other tax year beginning							
37 Pleasant Street	, and ending ,							
City or town, state, and ZIP code or country Concord, NH 03301-4005								
Concord, NH 03301-4005  Check type of shareholder filing the return: Individual X Corporation Partnersh	nip S Corporation Nongrantor Trust Estate							
Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions								
Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to t								
Insurance Corporation under the alternative facts and circumstances test within the meaning of section								
Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)	Employer identification number (if any)							
OCM Opps XB Chile Loan Holdings	00 1463705							
(Cayman) LP	98-1463705							
Address (Enter number, street, city or town, and country.)	Reference ID number (see instructions)							
190 Elgin Avenue	Tax year of foreign corporation, PFIC, or QEF: Calendar year 2023							
George Town, Grand Cayman, CAYMAN ISLANDS KY								
	and ending , .							
Part I Summary of Annual Information (see instructions)	•							
Provide the following information with respect to all shares of the PFIC held by the shareholder:								
1 Description of each class of shares held by the shareholder: Common Stock								
<ul><li>Check if shares jointly owned with spouse.</li><li>Date shares acquired during the tax year, if applicable:</li></ul>								
2 Date shares acquired during the tax year, if applicable:								
3 Number of shares held at the end of the tax year:								
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):								
(a) \$0-50,000 (b) X \$50,001-100,000 (c) \$100,001-150,000	(d) \$150,001-200,000							
(e) If more than \$200,000, list value:								
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution ι	under section 1291, inclusion under section 1293							
and inclusion or deduction under section 1296 (check all boxes that apply):								
(a) Section 1291 \$								
(b) Section 1293 (Qualified Electing Fund) \$								
(c) Section 1296 (Mark to Market) \$	See Statement 50							
Part II Elections (see instructions)								
B Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as B Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend	•							
of the QEF until this election is terminated. Complete lines 8a through 9c of Part III	to calculate the tax that may be deferred.							
<b>Note:</b> If any portion of line 6a or line 7a of Part III is includible under section 951, you m 1294(c) and 1294(f) and the related regulations for events that terminate this election.	ay <b>not</b> make this election. Also, see sections							
C Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-ma	rket the PFIC stock that is marketable within the meaning of section							
1296(e). Complete Part IV.								
Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QE PFIC. Enter gain or loss on line 15f of Part V.	F, elect to recognize gain on the deemed sale of my interest in the							
E Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as	a OEE that is a controlled foreign corporation (CEC), elect to treat an							
amount equal to my share of the post-1986 earnings and profits of the CFC as an excess								
excess distribution is greater than zero, also complete line 16 of Part V.								
F Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC	or a PFIC to which section 1297(d) applies, elect to treat as an excess							
distribution the gain recognized on the deemed sale of my interest in the PFIC on the las	t day of its last tax year as a PFIC under section 1297(a). <i>Enter</i>							
gain on line 15f of Part V.  Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder o	f a caction 1907(a) DEIC within the meaning of Deculations costion							
1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297	(e) PFIC. My holding period in the stock of the Section 1297(e)							
PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). distribution is greater than zero, also complete line 16, Part V.	Enter the excess distribution on line 15e, Part V. If the excess							
Deemed Dividend Election With Deepect to a Former DEIC La chareholder of a forme	r PFIC, within the meaning of Regulations section 1.1298-3(a),							
elect to make a deemed dividend election with respect to the former PFIC. My holding pe	eriod in the stock of the former PFIC includes the termination date, as							
defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than complete line 16, Part V.								

Pá	irt III Income From a Qualified Electing Fund (QEF). All QEF share	eholde	rs complete lines 6a through 7	7c. If yo	ou are making								
	Election B, also complete lines 8a through 9c. See instructions.												
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a											
b	Enter the portion of line 6a that is included in income under section 951 or that may be												
	excluded under section 1293(g)	6b											
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c									
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a											
b	Enter the portion of line 7a that is included in income under section 951 or that may be												
	excluded under section 1293(g)												
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun												
	used for your income tax return. See instructions 7c												
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.										
8 a	Add lines 6c and 7c			8a									
b	Enter the total amount of cash and the fair market value of other property distributed												
	or deemed distributed to you during the tax year of the QEF. See instructions	8b											
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares												
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c											
d	Add lines 8b and 8c			8d									
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e									
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,										
	you may make Election B with respect to the amount on line 8e.	1 .	i.										
	Enter the total tax for the tax year. See instructions	9a		4									
b	Enter the total tax for the tax year determined without regard to the amount entered	١											
	on line 8e	9b	<u> </u>	4									
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making										
D	Election B		ional	9c									
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>								
	Enter the fair market value of your PFIC stock at the end of the tax year			10a									
				10b									
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of the last restriction of the last restriction of the last restriction.		-	۱.,									
	on your tax return. If a loss, go to line 11			10c									
	Enter any unreversed inclusions (as defined in section 1296(d))			11									
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0									
10	loss on your tax return			12									
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the Enter the fair market value of the stock on the date of sale or disposition	-		13a									
				13b									
	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as or		income on your	130									
·		-	-	13c									
1 <b>4</b> 2	- · · · · · · · · · · · · · · · · · · ·			14a									
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·									
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b									
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I												
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c									
	<b>Note:</b> See instructions in case of multiple sales or dispositions.												

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

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current tax year.

25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19

26 Interest accrued after partial termination of election.

Subtract line 24 from line 20

# (Rev. December 2018) Department of the Treasury Internal Revenue Service

# Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Attachment Sequence No. **69** 

Nam	e of sh	areholder	Identifying number (see instructions)							
Ne	w H	ampshire Charitable Foundation	02-6005625							
		reet, and room or suite no. If a P.O. box, see instructions.  easant Street	-	2023 or other tax year beginning dending						
City	or towr	n, state, and ZIP code or country rd, NH 03301-4005								
		of shareholder filing the return: Individual X Corporation Partnershi	p S Corporation	Nongrantor Trust Estate						
		y Excepted Specified Foreign Financial Assets are reported on this form. See instructions .								
		nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to tr								
		Corporation under the alternative facts and circumstances test within the meaning of section								
		gn corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)	Employer identification numb 98-1490669	er (II any)						
V 44	roon (E	ntar number atreat eity or town and country		truotiona						
Auui	622 (EI	nter number, street, city or town, and country.)	Reference ID number (see ins	u ucuons)						
		lgin Avenue e Town, Grand Cayman, CAYMAN ISLANDS KY	Tax year of foreign corporation or other tax year beginning and ending	, PFIC, or QEF: Calendar year $2023$ ,						
	art I	Summary of Annual Information (see instructions)								
Prov		following information with respect to all shares of the PFIC held by the shareholder:								
1	Desc	cription of each class of shares held by the shareholder: Common Stock								
•		Check if shares jointly owned with spouse.								
2	Date	shares acquired during the tax year, if applicable:								
3	Num	ber of shares held at the end of the tax year:								
4	(a)	e of shares held at the end of the tax year (check the appropriate box, if applicable): $X$ \$0-50,000 <b>(b)</b> \$50,001-100,000 <b>(c)</b> \$100,001-150,000 If more than \$200,000, list value:	(d) \$150,001-200,00	00						
5		e of PFIC and amount of any excess distribution or gain treated as an excess distribution un inclusion or deduction under section 1296 (check all boxes that apply):  Section 1291 \$	nder section 1291, inclusion und	ler section 1293,						
	(b)	Section 1293 (Qualified Electing Fund) \$								
	(c)	Section 1296 (Mark to Market) \$	See	Statement 51						
Р	art II									
A B		Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you ma 1294(c) and 1294(f) and the related regulations for events that terminate this election.	he time for payment of tax on the calculate the tax that may be	e undistributed earnings and profits pe deferred.						
С		Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-mark 1296(e). Complete Part IV.	ket the PFIC stock that is market	able within the meaning of section						
D		<b>Deemed Sale Election</b> . I, a shareholder on the first day of a PFIC's first tax year as a QEF PFIC. Enter gain or loss on line 15f of Part V.	, elect to recognize gain on the c	deemed sale of my interest in the						
E		<b>Deemed Dividend Election.</b> I, a shareholder on the first day of a PFIC's first tax year as a amount equal to my share of the post-1986 earnings and profits of the CFC as an excess excess distribution is greater than zero, also complete line 16 of Part V.								
F		<b>Election To Recognize Gain on Deemed Sale of PFIC.</b> I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.								
G		<b>Deemed Dividend Election With Respect to a Section 1297(e) PFIC.</b> I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). <i>E distribution is greater than zero, also complete line 16, Part V.</i>	) PFIC. My holding period in the inter the excess distribution	stock of the Section 1297(e) on line 15e, Part V. If the excess						
Н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16. Part V.	iod in the stock of the former PF	IC includes the termination date, as						

Pá	irt III Income From a Qualified Electing Fund (QEF). All QEF share	eholde	rs complete lines 6a through 7	7c. If yo	ou are making								
	Election B, also complete lines 8a through 9c. See instructions.												
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a											
b	Enter the portion of line 6a that is included in income under section 951 or that may be												
	excluded under section 1293(g)	6b											
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c									
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a											
b	Enter the portion of line 7a that is included in income under section 951 or that may be												
	excluded under section 1293(g)												
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun												
	used for your income tax return. See instructions 7c												
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.										
8 a	Add lines 6c and 7c			8a									
b	Enter the total amount of cash and the fair market value of other property distributed												
	or deemed distributed to you during the tax year of the QEF. See instructions	8b											
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares												
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c											
d	Add lines 8b and 8c			8d									
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e									
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,										
	you may make Election B with respect to the amount on line 8e.	1 .	i.										
	Enter the total tax for the tax year. See instructions	9a		4									
b	Enter the total tax for the tax year determined without regard to the amount entered	١											
	on line 8e	9b	<u> </u>	4									
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making										
D	Election B		ional	9c									
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>								
	Enter the fair market value of your PFIC stock at the end of the tax year			10a									
				10b									
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of the last restriction of the last restriction of the last restriction.		-	۱.,									
	on your tax return. If a loss, go to line 11			10c									
	Enter any unreversed inclusions (as defined in section 1296(d))			11									
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0									
10	loss on your tax return			12									
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the Enter the fair market value of the stock on the date of sale or disposition	-		13a									
				13b									
	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as or		income on your	130									
·		-	-	13c									
1 <b>4</b> 2	- · · · · · · · · · · · · · · · · · · ·			14a									
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·									
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b									
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I												
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c									
	<b>Note:</b> See instructions in case of multiple sales or dispositions.												

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

current tax year.

25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19

26 Interest accrued after partial termination of election.

Subtract line 24 from line 20

#### Information Return by a Shareholder of a Passive Foreign **Investment Company or Qualified Electing Fund**

OMB No. 1545-1002

Attachment ► Go to www.irs.gov/Form8621 for instructions and the latest information. Sequence No. 69 **Identifying number** (see instructions) Name of shareholder New Hampshire Charitable Foundation 02-6005625 Number, street, and room or suite no. If a P.O. box, see instructions. Shareholder tax year: calendar year 2023 or other tax year beginning 37 Pleasant Street and ending City or town, state, and ZIP code or country 03301-4005 Concord, NH Check type of shareholder filing the return: Individual X Corporation Partnership S Corporation Nongrantor Trust Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) Employer identification number (if any) OCM Opps Weather CTB, LTD 98-1323485 Address (Enter number, street, city or town, and country.) Reference ID number (see instructions) 190 Elgin Avenue Tax year of foreign corporation, PFIC, or QEF: Calendar year  $\overline{2023}$ George Town, Grand Cayman, CAYMAN ISLANDS KY or other tax year beginning and ending Summary of Annual Information (see instructions) Provide the following information with respect to all shares of the PFIC held by the shareholder: Description of each class of shares held by the shareholder: Common Stock Check if shares jointly owned with spouse. Date shares acquired during the tax year, if applicable: Number of shares held at the end of the tax year: Value of shares held at the end of the tax year (check the appropriate box, if applicable): **(b)** \$50.001-100.000 (a) X \$0-50.000 (c) \$100.001-150.000 \$150.001-200.000 (e) If more than \$200,000, list value: Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply): Section 1291 \$ Section 1293 (Qualified Electing Fund) \$ (b) See Statement 52 (c) L Section 1296 (Mark to Market) \$ Part II Elections (see instructions) Lection To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III. Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred.

Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections В 1294(c) and 1294(f) and the related regulations for events that terminate this election. Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e), Complete Part IV. Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line 15f of Part V. Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an Εl amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part V. Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line 15f of Part V. Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V. Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also

complete line 16. Part V.

Pá	irt III Income From a Qualified Electing Fund (QEF). All QEF share	eholde	rs complete lines 6a through 7	7c. If yo	ou are making								
	Election B, also complete lines 8a through 9c. See instructions.												
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a											
b	Enter the portion of line 6a that is included in income under section 951 or that may be												
	excluded under section 1293(g)	6b											
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c									
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a											
b	Enter the portion of line 7a that is included in income under section 951 or that may be												
	excluded under section 1293(g)												
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun												
	used for your income tax return. See instructions 7c												
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.										
8 a	Add lines 6c and 7c			8a									
b	Enter the total amount of cash and the fair market value of other property distributed												
	or deemed distributed to you during the tax year of the QEF. See instructions	8b											
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares												
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c											
d	Add lines 8b and 8c			8d									
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e									
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,										
	you may make Election B with respect to the amount on line 8e.	1 .	i.										
	Enter the total tax for the tax year. See instructions	9a		4									
b	Enter the total tax for the tax year determined without regard to the amount entered	١											
	on line 8e	9b	<u> </u>	4									
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making										
D	Election B		ional	9c									
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>								
	Enter the fair market value of your PFIC stock at the end of the tax year			10a									
				10b									
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of the last restriction of the last restriction of the last restriction.		-	۱.,									
	on your tax return. If a loss, go to line 11			10c									
	Enter any unreversed inclusions (as defined in section 1296(d))			11									
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0									
10	loss on your tax return			12									
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the Enter the fair market value of the stock on the date of sale or disposition	-		13a									
				13b									
	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as or		income on your	130									
·		-	-	13c									
1 <b>4</b> 2	- · · · · · · · · · · · · · · · · · · ·			14a									
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·									
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b									
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I												
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c									
	<b>Note:</b> See instructions in case of multiple sales or dispositions.												

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

current tax year.

25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19

26 Interest accrued after partial termination of election.

Subtract line 24 from line 20

# (Rev. December 2018) Department of the Treasury Internal Revenue Service

# Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

► Go to www.irs.gov/Form8621 for instructions and the latest information.

Attachment Sequence No. **69** 

Nam	e of sh	areholder	Identifying number (see instructions)								
Ne	w H	ampshire Charitable Foundation	02-6005625								
		reet, and room or suite no. If a P.O. box, see instructions.	Shareholder tax year: calendar year 2023 or other tax year beginning								
		easant Street	, and ending , .								
		n, state, and ZIP code or country ord, NH 03301-4005									
Che	ck type	of shareholder filing the return: Individual X Corporation Partnershi	p S Corporation Nongrantor Trust Estate								
		y Excepted Specified Foreign Financial Assets are reported on this form. See instructions .									
		nsurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to tr									
		Corporation under the alternative facts and circumstances test within the meaning of sectio									
		ign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) ingy Holdings IV CTD, LLC	Employer identification number (if any)								
			98-1549179								
Add	ress (Ei	nter number, street, city or town, and country.)	Reference ID number (see instructions)								
19	0 E	lgin Avenue	Tax year of foreign corporation, PFIC, or QEF: Calendar year 2023								
George Town, Grand Cayman, CAYMAN ISLANDS Ky or other tax year beginning											
P	art I	Summary of Annual Information (see instructions)	and ending , .								
Prov	ide the	following information with respect to all shares of the PFIC held by the shareholder:									
1	Desc	cription of each class of shares held by the shareholder: Common Stock									
		Check if shares jointly owned with spouse.									
2	Date	shares acquired during the tax year, if applicable:									
3	Num	nber of shares held at the end of the tax year:									
4		e of shares held at the end of the tax year (check the appropriate box, if applicable):  X \$0-50,000 (b) \$50,001-100,000 (c) \$100,001-150,000	( <b>d</b> ) \$150,001-200,000								
	٠,		(d) \$150,001-200,000								
	(6)	If more than \$200,000, list value:									
5	Type	e of PFIC and amount of any excess distribution or gain treated as an excess distribution ur	nder section 1291, inclusion under section 1293								
		inclusion or deduction under section 1296 (check all boxes that apply):									
	(a)	Section 1291 \$									
	(b)	Section 1293 (Qualified Electing Fund) \$									
	(c)	Section 1296 (Mark to Market) \$	See Statement 53								
P	art II										
Α	Щ	<b>Election To Treat the PFIC as a QEF. I, </b> a shareholder of a PFIC, elect to treat the PFIC as	•								
В		election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the QEF until this election is terminated. Complete lines 8a through 9c of Part III to Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may 1294(c) and 1294(f) and the related regulations for events that terminate this election.	o calculate the tax that may be deferred.								
С		<b>Election To Mark-to-Market PFIC Stock</b> . I, a shareholder of a PFIC, elect to mark-to-mark 1296(e). <i>Complete Part IV</i> .	xet the PFIC stock that is marketable within the meaning of section								
D		<b>Deemed Sale Election</b> . I, a shareholder on the first day of a PFIC's first tax year as a QEF PFIC. Enter gain or loss on line 15f of Part V.	, elect to recognize gain on the deemed sale of my interest in the								
Ε		Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a									
		amount equal to my share of the post-1986 earnings and profits of the CFC as an excess excess distribution is greater than zero, also complete line 16 of Part V.	distribution. Enter this amount on line 15e of Part V. If the								
F		<b>Election To Recognize Gain on Deemed Sale of PFIC.</b> I, a shareholder of a former PFIC distribution the gain recognized on the deemed sale of my interest in the PFIC on the last gain on line 15f of Part V.									
G		Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). E distribution is greater than zero, also complete line 16, Part V.	) PFIC. My holding period in the stock of the Section 1297(e)								
Н		Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former elect to make a deemed dividend election with respect to the former PFIC. My holding per defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e complete line 16, Part V.	iod in the stock of the former PFIC includes the termination date, as								

Pá	irt III Income From a Qualified Electing Fund (QEF). All QEF share	eholde	rs complete lines 6a through 7	7c. If yo	ou are making								
	Election B, also complete lines 8a through 9c. See instructions.												
6 a	Enter your pro rata share of the ordinary earnings of the QEF	6a											
b	Enter the portion of line 6a that is included in income under section 951 or that may be												
	excluded under section 1293(g)	6b											
C	Subtract line 6b from line 6a. Enter this amount on your tax return as ordinary income $\dots$		·····	6c									
7 a	Enter your pro rata share of the total net capital gain of the QEF	7a											
b	Enter the portion of line 7a that is included in income under section 951 or that may be												
	excluded under section 1293(g)												
C	Subtract line 7b from line 7a. This amount is a net long-term capital gain. Enter this amoun												
	used for your income tax return. See instructions 7c												
	Complete lines 8 and 9 only if you are making a section 1294 election (Election B) for the	ne curr	ent tax year.										
8 a	Add lines 6c and 7c			8a									
b	Enter the total amount of cash and the fair market value of other property distributed												
	or deemed distributed to you during the tax year of the QEF. See instructions	8b											
C	Enter the portion of line 8a not already included in line 8b that is attributable to shares												
	in the QEF that you disposed of, pledged, or otherwise transferred during the tax year $\dots$	8c											
d	Add lines 8b and 8c			8d									
е	Subtract line 8d from line 8a, and enter the difference (if zero or less, enter amount in brack			8e									
	Important: If line 8e is greater than zero, and no portion of line 6a or 7a is includible	le in in	come under section 951,										
	you may make Election B with respect to the amount on line 8e.	1 .	i.										
	Enter the total tax for the tax year. See instructions	9a		4									
b	Enter the total tax for the tax year determined without regard to the amount entered	١											
	on line 8e	9b	<u> </u>	4									
C	Subtract line 9b from line 9a. This is the deferred tax, the time for payment of which is ex	xtende	1 by making										
D	Election B		ional	9c									
	Int IV Gain or (Loss) From Mark-to-Market Election (see ins			140-	<u> </u>								
	Enter the fair market value of your PFIC stock at the end of the tax year			10a									
				10b									
С	Subtract line 10b from line 10a. If a gain, do not complete lines 11 and 12. Include this amount of the last restriction of the last restriction of the last restriction of the last restriction.		-	۱.,									
	on your tax return. If a loss, go to line 11			10c									
	Enter any unreversed inclusions (as defined in section 1296(d))			11									
12	Enter the loss from line 10c, but only to the extent of unreversed inclusions on line 11. Inclu			1,0									
10	loss on your tax return			12									
	If you sold or otherwise disposed of any section 1296 stock (see instructions) during the Enter the fair market value of the stock on the date of sale or disposition	-		13a									
				13b									
	Subtract line 13b from line 13a. If a gain, do not complete line 14. Include this amount as or		income on your	130									
·		-	-	13c									
1 <b>4</b> 2	- · · · · · · · · · · · · · · · · · · ·			14a									
	Enter the loss from line 13c, but only to the extent of unreversed inclusions on line 14a. Incl			- · · · ·									
-	loss on your tax return. If the loss on line 13c exceeds unreversed inclusions on line 14a, co			14b									
C	Enter the amount by which the loss on line 13c exceeds unreversed inclusions on line 14a. I												
	return according to the rules generally applicable for losses provided elsewhere in the Code			14c									
	<b>Note:</b> See instructions in case of multiple sales or dispositions.												

#### Part V Distributions From and Dispositions of Stock of a Section 1291 Fund(see instructions) Complete a separate Part V for each excess distribution and disposition. See instructions. 15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions 15a **b** Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) 15b c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3.) 15c **d** Multiply line 15c by 125% (1.25) 15d e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return 15e f Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 16. If a loss, show it in brackets and **do not** complete line 16 15f 16 a If there is a positive amount on line 15e or 15f (or both), attach a statement for each excess distribution and disposition. Show your holding period for each share of stock or block of shares held. Allocate the excess distribution or gain to each day in your holding period. Add all amounts that are allocated to days in each tax year. **b** Enter the total of the amounts determined in line 16a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC years). Enter these amounts on your income tax return as other income 16b c Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). See instructions 16c d Foreign tax credit (see instructions) 16d e Subtract line 16d from line 16c. Enter this amount on your income tax return as "additional tax." See instructions 16e f Determine interest on each net increase in tax determined on line 16e using the rates and methods of section 6621. Enter the aggregate amount of interest here. See instructions 16f

#### Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections Complete a separate column for each outstanding election. Complete lines 17 through 20 to report the status of outstanding prior year section 1294 elections. (i) (ii) (iii) (iv) (v) (vi) 17 Tax year of outstanding election ..... 18 Undistributed earnings to which the election relates 19 Deferred tax 20 Interest accrued on deferred tax (line 19) as of the filing date ..... Complete lines 21 through 24 only if a section 1294 election is terminated in the current year. 21 Event terminating election 22 Earnings distributed or deemed distributed during the tax year 23 Deferred tax due with this return \_\_\_\_\_ 24 Accrued interest due with this return Complete lines 25 and 26 only if there is a partial termination of a section 1294 election in the

Form **8621** (Rev. 12-2018)

current tax year.

25 Deferred tax outstanding after partial termination of election. Subtract line 23 from line 19

26 Interest accrued after partial termination of election.

Subtract line 24 from line 20

# Return of U.S. Persons With Respect to Certain Foreign Partnerships

Attach to your tax return.

Go to www.irs.gov/Form8865 for instructions and the latest information.

Information furnished for the foreign partnership's tax year

OMB No. 1545-1668

Department of the Treasury Internal Revenue Service

Name of person filing this return

beginning JAN 1 , 2023, and ending  $\,DEC\,$   $\,31\,$  ,  $\,2023\,$ Filer's identification number

Attachment Sequence No. **865** 

					0	2-600	5625		
New Hampshire Char	itable	Foundation							
Filer's address (if you aren't filing this form wi	th your tax re	turn)	A Category of	of filer (see Categories	s of Filers in th	e instructions	and check ap	plicable box(e	es)):
37 Pleasant Street			1 [	2	3	X	4		
Concord, NH 03301-4	005		B Filer's tax	year JAN 1	202	3 and end	ing DEC	31, 20	023
C Filer's share of liabilities: Nonrecourse \$		Qualified nonre	ecourse financii	ng \$		Other		<del></del>	
D If filer is a member of a consolidated group	but not the								
Name		,			EIN				
Address									
E Check if any excepted specified foreign final	ancial assets	are reported on this form.	See instruction	S					
F Information about certain other partners (s									
		,				(4)	Check applica	able box(es)	
(1) Name		(2) Address		(3) Identification	n number	Category 1	Category 2	Constructive	owner
<b>G1</b> Name and address of foreign partnership						2(a) EIN	(if any)		
Oaktree Opportunitie	s Fund	XB AIF				98	-1208	442	
(Cayman), LP						1	rence ID nu		
333 South Grand Aven	ue, 28	th Floor				` ′			
Los Angeles, CA 900	-					3 Country	under who	se laws orga	anized
J. 1.1.							n Isl	-	
4 Date of organization 5 Principal place of business		6 Principal business activity code number	7 Principal bus	siness	8a Func				
09/01/2018Cayman Isl	ands	523900	'activity Investm	ents	USD	ПСУ	1	ange rate nstructions) • 0 0 0 0	00
<b>H</b> Provide the following information for the f	oreign partne	rship's tax year:							
1 Name, address, and identification number			2 Check if th	ne foreign partn <u>er</u> s	ship must fi		_		
Oaktree Capital Mana			Fo	orm 1042	Form 88	04 X	☐ Form 106	35	
333 South Grand Aven	ue, 28	th Floor		enter where Form	1065 is filed	i:			
Los Angeles, CA 900			E-fi						
3 Name and address of foreign partnership's			4 Name and a partnership,	ddress of person(s) and the location of s	with custody of such books an	d records, if c	na recoras of lifferent	ne foreign	
Walkers Corporate Se	rvices	Limited		e Capita					
27 Hospital Road		_		uth Grar		•	28th	Floor	
George Town, Grand C						071			
5 During the tax year, did the foreign partr			-						
allowed under section 267A? See instru							Yes	X	No
If "Yes," enter the total amount of the dis							\$		
6 Is the partnership a section 721(c) partr							Yes		No
7 Were any special allocations made by th	e foreign par	tnership?					X Yes	I	No
8 Enter the number of Forms 8858, Inform									
(FDEs) and Foreign Branches (FBs), atta									
9 How is this partnership classified under	the law of the	country in which it's orga	nized?			Partn	ershi	p	
10 a Does the filer have an interest in the fore		• • • • • • • • • • • • • • • • • • • •	-						
separate unit under Regulations section		, , , .	-	-					
1.1503(d)-1(b)(4)(ii)? If "No," skip quest	tion 10b						Yes	X	No
<b>b</b> If "Yes," does the separate unit or combi	ned separate	unit have a dual consolida	ted loss, as def	ined in Regulation	IS				
							Yes	!	No
11 Does this partnership meet <b>both</b> of the f	ollowing requ	irements?		)					
<ol> <li>The partnership's total receipts for th</li> </ol>	-								
2. The value of the partnership's total as		nd of the tax year was less	than \$1 million	· [			Yes	!	No
If "Yes," don't complete Schedules L, M-	1, and M-2.			J					
For Privacy Act and Paperwork Reduction Ac	ct Notice, see	the separate instructions	3.					Form <b>8865</b> (	(2023)

LHA 310651 10-27-23

Form 8865 (2023)

#### **SCHEDULE O** (Form 8865)

(Rev. October 2021)

## Transfer of Property to a Foreign Partnership (Under Section 6038B)

➤ Attach to Form 8865. See the Instructions for Form 8865. ► Go to www.irs.gov/Form8865 for instructions and the latest information.

OMB No. 1545-1668

Department of the Treasury Internal Revenue Service

name of transfero		mnahi	ro Char	i+ahl	e Foundati	on		02-61	005625			
Name of foreign p					es Fund XB		EIN (if any)				er (see instr	
		ayman					98-120				` .	
1a Is the partr	nership a section 7	21(c) partne	rship (as define	d in Regula	tions section 1.721(c)-	1(b)(14))?	See instruction	ns		Yes	X No	
	-			-	n of gain upon the cont					Yes	☐ No	
					be, at the time of the tr							
				ulations sec	tion 1.482-7(c)(1)?					Yes	X No	
Part I T	ransfers Reportab											
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market v on date of tra		(d) Cost or other basis		e) ry period	(f) Section 704 allocation met		(g) Gain recognize on transfer		
Cash	12/31/23		242,	724.								
Stock, notes receivable												
and payable,												
and other												
securities												
Inventory				+								
				+								
Tangible												
property												
used in trade or business												
Intangible property												
described in												
section 197(f)(9)												
Intangible												
property, other than intangible												
property												
described in section 197(f)(9)												
Other												
property												
Totals			242,	724								
	ansferor's percent	ane interect			re the transfer	0680	%	(h) After t	the transfer		0690 %	
	formation Require	-		,	TO THE HUMBION	0000	70	(b) / littor i	ano transion	<u> </u>	0000 70	
					d interest	in O	aktree	Opport	tuniti	es		
	XB AIF (											
5	5		0 11 00000									
	ispositions Report	adie Under		( D	1		(0)		1			
(a) Type of property	(b) Date of original transfer			(d) Manner of disposition	(e) Gain recognized by partnership	re rec	(f) preciation ecapture cognized partnership	(g) Gain alloca to partne		Depr recaptur	(h) eciation e allocated partner	
Dow! III			1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		1	004/0/5		(0./E)./E).0		1.,	T7	
					ognition under section	904(f)(3) (	or section 904		<b>&gt;</b> L	Yes	X No	
LHA For Papers	work Reduction Ac	t Notice, se	e the Instructio	ns tor Form	8865.			8	schedule O (I	⊦orm 8	865) 10-2021	

310661 04-01-23

# Return of U.S. Persons With Respect to Certain Foreign Partnerships

Attach to your tax return.
Go to www.irs.gov/Form8865 for instructions and the latest information.

Information furnished for the foreign partnership's tax year

beginning JAN 1

, 2023, and ending  $\,$  DEC  $\,$  31  $\,$  ,  $\,$  2023

OMB No. 1545-1668

Department of the Treasury Internal Revenue Service

Attachment Sequence No. **865** Filer's identification number

Name of person filing this return						Fil	ler's	identificat	tion nu	ımber	•	
							02	2-600	562	5		
New Hampshire Char	itable	Foundation										
Filer's address (if you aren't filing this form wi	th your tax re	turn)	A Category o	of filer (s	see Categories	of Filers in	n the	instructions	and ch	eck app	olicable b	ox(es)):
37 Pleasant Street			1 [		2			X	4 [			
Concord, NH 03301-4	005		B Filer's tax y	year	JAN 1	. , 20	23	3, and endi	ing D	EC	31,	2023
C Filer's share of liabilities: Nonrecourse \$		Qualified non	recourse financii	ng \$				Other	\$			
D If filer is a member of a consolidated group	but not the	parent, enter the following	information abo	out the	e parent:							
Name						EIN						
Address												
E Check if any excepted specified foreign final	ancial assets	are reported on this form	. See instruction:	s								. 🔲
F Information about certain other partners (s	ee instructio	ns)										
(d) Name		(O) Address		,,	O) Idantification	m mala au	L	(4) (	Check a	applical	ble box(e	s)
(1) Name	(2) Address		(4	3) Identification	number		Category 1	Categ	ory 2	Constru	ctive owner	
<b>G1</b> Name and address of foreign partnership	_							2(a) EIN (				
Oaktree Opportunitie	s Func	XB, LP					L				852	
								<b>2(b)</b> Refe	rence	ID nur	nber	
333 South Grand Aven		th Floor					L					
Los Angeles, CA 900	71							3 Country				-
Data of Principal place		Dringing business	Dringing bus	inooo		<del></del>		Cayma				
4 Date of organization 5 Principal place of business	3	6 Principal business activity code number	7 Principal bus		· 	8a Fu	rren	cy C	8b (	see in	nge rate structio	ns)
06/01/2018Cayman Isl		523900	Investm	ent	ts	USD					.000	000
H Provide the following information for the foreign partnership's tax year:												
1 Name, address, and identification number			2 Check if th		_	¬ ·			٦	- 400	_	
Oaktree Capital Mana 333 South Grand Aven				rm 10		_ Form		4 [A	Forr	n 106	5	
Los Angeles, CA 900	-	CII FIOOI	E-fi		where Form	1065 IS II	nea:					
3 Name and address of foreign partnership's		untry of organization if an			of person(s) w	ith custod	ly of t	the books an	id recor	ds of th	ne foreigr	
Walkers Corporate Se			oaktre									
27 Hospital Road	IVICC	DIMICCA	333 So									r
George Town, Grand C	avman	Cayman Tgla						71	200	.11 .	1 100	<b>,</b>
5 During the tax year, did the foreign partr								,,_				
allowed under section 267A? See instru		-								Yes	Z	No No
If "Yes," enter the total amount of the dis									<u> </u>			
6 Is the partnership a section 721(c) partn									Ŭ	Yes	Σ	No D
<ul><li>7 Were any special allocations made by th</li></ul>									X		=	No
8 Enter the number of Forms 8858, Inform												
(FDEs) and Foreign Branches (FBs), atta					-							
9 How is this partnership classified under							Ι	artn	ers	hi	0	
10 a Does the filer have an interest in the fore												
separate unit under Regulations section												
1.1503(d)-1(b)(4)(ii)? If "No," skip quest										Yes	Σ	No
<b>b</b> If "Yes," does the separate unit or combined separate unit have a dual consolidated loss, as defined in Regulations												
4 4500/ 1/ 4/1 //5///0		,							Yes		No	
11 Does this partnership meet <b>both</b> of the fe				٠								
1. The partnership's total receipts for th												
2. The value of the partnership's total as	-		s than \$1 million							Yes		No
If "Yes," don't complete Schedules L, M-				J								
For Privacy Act and Paperwork Reduction Ac	t Notice, see	the separate instruction	ıs.							F	orm <b>88</b>	<b>65</b> (2023)

LHA 310651 10-27-23

Form 8865 (2023)

#### **SCHEDULE O** (Form 8865)

Transfer of Property to a Foreign Partnership (Under Section 6038B)

(Rev. October 2021) Department of the Treasury Internal Revenue Service

► Attach to Form 8865. See the Instructions for Form 8865. ► Go to www.irs.gov/Form8865 for instructions and the latest information.

OMB No. 1545-1668

Name of transfero	r									Filer's ident			
	New Ha										00562		
Name of foreign p	artnership Oa	ktree	Oppor	tunit	ies	Fund	XB,	LP	EIN (if any)		Referenc	e ID num	ber (see instr)
d a la tha nautu	anabia a aaatiaa 70	01/2) = 2 = 1	undin (an dafi	madia Dasu	م مداه ما	tion 4 70	24/2) 4/	(F) (44)\0	98-118			Vaa	X No
	nership a section 72 s the gain deferral									ons		_ Yes □ Yes	No No
	tangible property t			-		-						169	NO
	fter, a platform cor											Yes	X No
	ransfers Reportab					, , ,	,						
Type of property				et value transfer		(d) Cost or other basis			e) ry period	(f) Section 704 allocation me			(g) ecognized transfer
Cash	12/31/23		348	,873.									
Stock, notes receivable and payable, and other securities													
Inventory													
Tangible property used in trade or business													
Intangible property described in section 197(f)(9)													
Intangible property, other than intangible property described in section 197(f)(9)													
Other property													
Totals			348	,873.									
Supplemental Inf Consi	ansferor's percent formation Require deration XB, LP	d To Be Re	in the partner	rship: (a) Be structions):	fore th			0650 in O	% aktree	. ,	the transfe		0650 %
Part II D	ispositions Report	able Under	Section 6038	ВВ									
(a) Type of property	Date of Da		(c) (d) Date of Manner of disposition					(f) Depreciation recapture recognized by partnership		(g) Gain alloca to partn		recaptu	(h) reciation re allocated partner
	any transfer repor vork Reduction Ac				_		ection 9	04(f)(3) o	or section 904	.,.,,	Schedule (	Yes	X No

310661 04-01-23

### Form **8865**

Department of the Treasury

Internal Revenue Service

## Return of U.S. Persons With Respect to Certain Foreign Partnerships

Attach to your tax return.

Go to www.irs.gov/Form8865 for instructions and the latest information.

Information furnished for the foreign partnership's tax year

beginning JAN 1 .

, 2023, and ending  $\,DEC\,$   $\,31\,$  ,  $\,2023\,$ 

OMB No. 1545-1668

**2023** 

Sequence No. **86** 

Form 8865 (2023)

Filer's identification number Name of person filing this return 02-6005625 New Hampshire Charitable Foundation Filer's address (if you aren't filing this form with your tax return) A Category of filer (see Categories of Filers in the instructions and check applicable box(es)): 37 Pleasant Street 3 | X | 2 2023 , and ending DEC Concord, NH 03301-4005 В JAN 31 2023 beainnina C Filer's share of liabilities: Nonrecourse \$ Qualified nonrecourse financing \$ Other \$ D If filer is a member of a consolidated group but not the parent, enter the following information about the parent: EIN Name Address Check if any excepted specified foreign financial assets are reported on this form. See instructions Information about certain other partners (see instructions) (4) Check applicable box(es) (1) Name (2) Address (3) Identification number Category 1 Category 2 Constructive owner **2(a)** EIN (if any) G1 Name and address of foreign partnership Linden Capital Partners V-A AIV LP 98-1701372 2(b) Reference ID number 110 North Wacker Drive, 55th Floor 60606 3 Country under whose laws organized Chicago, IL Canada 6 Principal business activity code number 5 2 3 9 0 0 5 Principal place of business 7 Principal business activity 8a Functional currency Exchange rate (see instruction ▲ Date of 11/30/2022Canada Investments USD 1.000000 H Provide the following information for the foreign partnership's tax year: 1 Name, address, and identification number of agent (if any) in the United States 2 Check if the foreign partnership must file: X Form 1065 Linden Manager V AIV LP Form 1042 Form 8804 110 North Wacker Drive Service Center where Form 1065 is filed: Chicago, IL 60606 E-file 4 Name and address of person(s) with custody of the books and records of the foreign partnership, and the location of such books and records, if different 3 Name and address of foreign partnership's agent in country of organization, if any 152928 Canada Inc linden Manager V AIV LP 199 Bay Street, 5300 Commerce CT W 110 North Wacker Drive Toronto, Ontario Canada M5L 1B9 Chicago, ID During the tax year, did the foreign partnership pay or accrue any interest or royalty for which the deduction is not X No allowed under section 267A? See instructions If "Yes," enter the total amount of the disallowed deductions X No 6 Is the partnership a section 721(c) partnership, as defined in Regulations section 1.721(c)-1(b)(14)? Yes X No 7 Were any special allocations made by the foreign partnership? Enter the number of Forms 8858, Information Return of U.S. Persons With Respect to Foreign Disregarded Entities (FDEs) and Foreign Branches (FBs), attached to this return. See instructions How is this partnership classified under the law of the country in which it's organized? Partnership 10 a Does the filer have an interest in the foreign partnership, or an interest indirectly through the foreign partnership, that's a separate unit under Regulations section 1.1503(d)-1(b)(4) or part of a combined separate unit under Regulations section X No 1.1503(d)-1(b)(4)(ii)? If "No," skip question 10b b If "Yes," does the separate unit or combined separate unit have a dual consolidated loss, as defined in Regulations No section 1.1503(d)-1(b)(5)(ii)? 11 Does this partnership meet both of the following requirements? 1. The partnership's total receipts for the tax year were less than \$250,000. 2. The value of the partnership's total assets at the end of the tax year was less than \$1 million. Yes

LHA 310651 10-27-23

If "Yes," don't complete Schedules L, M-1, and M-2.

For Privacy Act and Paperwork Reduction Act Notice, see the separate instructions.

orm 886	5 (20	)23)	N	Iew	Har	mps	shi	re Cl	narit	ta	ble	Fo	undat	tic	n					02	2-60	056	25	Page 2
b 6	espe Inter	ct to a	any 1 mou	ransa nt of	oction w gross re	vith the eceipt	ie forei ts deriv	gn partne ved from a	ership? If all sales o	"Ye: of ge	s," comp eneral pr	olete lir roperty	DII) dedunes 12b, 1 to the for DEI)	l2c, a reign	nd 12d. S partnersl	See instru nip that th	ctions ie filer					Yes		□ No
i	nclud	ded in	its (	compi	utation (	of FDI	DEI .						erty to the											
		the a			- -	-							foreign pa		-									
13 E	nter	the n	umb	er of	foreign	partn	ners su	bject to s	ection 86	4(c	)(8) as a	ı result	t of transfe	errinç	all or a p	ortion of	an int	terest i	n					
													and ito nor											
At any time during the tax year were any transfers between the partnership and its partners subject to the disclosure requirements of Regulations section 1.707-8?														Yes		□ No								
Gign Here Control of You're File This Form Geparately Flot With You	ing and												ompanying I liability co											
ax Return.		Drin+/T			of general er's name	<u> </u>	ner or lin	nited liabilit			mber s signatur	re .				Date					I PT		ate	
Paid Prepai		Priniv i	ype p	repare	er s name	е			Пера	ai Ci	3 Signatur					Date			heck elf-em	ploye	if			
Jse	ן''	Firm's	s nai	ne												•		Firm's	s EIN					
Only		Firm's	s ado	dress														Phon	e no.					
Sched				box	b, en	nter t	the na	-	ldress,	and	d U.S.	taxp	rest. Cl ayeride ns. b		cation r		(if a	ny) of	the		•			
				Na	me								Address					Identific	cation	numbe	er (if any	)	Check if foreign person	Check if direct partner
									+															
Sched	ule	A-1		Cer	tain P	Partr	ners	of Fore	ign Par	rtne	ership	(see	e instruc	ctior	ns)									
				Na	me								Address					ld	entific	ation r	number (	if any)		Check if foreign person
									+															
Sched	ule	A-2		For	eign F	Partr	ners	of Sect	tion 72	1(c	) Partr	nersh	nip (see	e ins	truction	ns)								<u> </u>
Name of	foreig						Address			Ť	C	Country ganizat	of		U.S. tax			Check i			F	Percenta	ge intere	st
part	ner		_							1		(if any)		$\perp$	(if a			U.S. t	ransfe	or	Сар	ital	F	rofits
			+							+				+				L	+	_		%		<u>%</u>
loop the	oortn	orobii	n hou	(0, 0P)	, other f	foroia	n nore	son as a d	iroot part	nor	2							L		4	Yes	%	<u> </u>	% T No.
Sched			Jila	Affi	liation	n Sc	hedu		all part	tne	rships		eign or d	lome	estic) in	which	the f	oreig	n pa	L				_ No
				Na									Address					El (if a				Total ord		Check it foreign partner- ship
Life	sty	/le	s	Рa	rent	t I	Ρ						ackeı			:	App	lied	For					Х
									Chic	ca	go,	IL	606	506	)									

Form **8865** (2023)

#### **SCHEDULE O** (Form 8865)

Transfer of Property to a Foreign Partnership (Under Section 6038B)

(Rev. October 2021) Department of the Treasury Internal Revenue Service

➤ Attach to Form 8865. See the Instructions for Form 8865.

OMB No. 1545-1668

► Go to www.irs.gov/Form8865 for instructions and the latest information.

Name of transfero		mpshi	re Cha	ritab	le Foundati	on			005625		
Name of foreign p					tners V-A A		EIN (if any) 98–170	<u> </u>	Reference II	numbe	r (see instr
<ul><li>b If "Yes," wa</li><li>2 Was any in time therea</li></ul>	s the gain deferral tangible property t	method app transferred c ntribution as	lied to avoid t onsidered or a defined in Re	he recognition	lations section 1.721(c) on of gain upon the con to be, at the time of the tection 1.482-7(c)(1)?	tribution of ransfer or a	See instruction property? t any	ns		Yes	X No No
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair marke on date of		(d) Cost or other basis		ry period	(f) Section 704 allocation met		(g) Gain reco	gnized
Cash Stock, notes receivable and payable, and other securities	12/31/23		367	,768.							
Inventory											
Tangible property used in trade or business											
Intangible property described in section 197(f)(9)											
Intangible property, other than intangible property described in section 197(f)(9)											
Other property											
Totals			367	,768.							
Supplemental Inf	ansferor's percent ormation Require	d To Be Rep	orted (see ins	structions):	tore the transfer		%	(b) After 1	the transfer		%
(a) Type of property	(b) Date of original transfer		(c) late of position	(d) Manner of disposition	(e) Gain recognized by partnership	re	(f) preciation ecapture cognized partnership	(g) Gain alloca to partne		(h) Depreci ecapture a to par	ation allocated
	any transfer repor				 ecognition under section m 8865.	1 n 904(f)(3) d	or section 904		► Chedule 0 (F	Yes	X No

310661 04-01-23

### Form **8865**

Department of the Treasury

Internal Revenue Service

## Return of U.S. Persons With Respect to Certain Foreign Partnerships

Attach to your tax return.

Go to www.irs.gov/Form8865 for instructions and the latest information.

Information furnished for the foreign partnership's tax year

beginning JAN 1 , 2023, and ending DEC 31 , 2023

OMB No. 1545-1668

**2023** 

Filer's identification number Name of person filing this return 02-6005625 New Hampshire Charitable Foundation Filer's address (if you aren't filing this form with your tax return) A Category of filer (see Categories of Filers in the instructions and check applicable box(es)): 37 Pleasant Street 3 | X | 2  $\overline{2023}$  , and ending DEC Concord, NH 03301-4005 В JAN 31 2023 beainnina C Filer's share of liabilities: Nonrecourse \$ Qualified nonrecourse financing \$ Other \$ D If filer is a member of a consolidated group but not the parent, enter the following information about the parent: EIN Name Address Check if any excepted specified foreign financial assets are reported on this form. See instructions Information about certain other partners (see instructions) (4) Check applicable box(es) (1) Name (2) Address (3) Identification number Category 1 Category 2 Constructive owner **2(a)** EIN (if any) G1 Name and address of foreign partnership Highland Europe Technology Growth V LP 98-1659261 2(b) Reference ID number Aztec Group House, IFC6, The Esplanade St. Helier, Jersey JE4 0QH 3 Country under whose laws organized Jersev 6 Principal business activity code number 4 Date of Exchange rate (see instructions)
924000 5 Principal place of business 7 Principal business activity 8a Functional currency ctivity code nu 523900 02/07/2022Jersey Investments EUR H Provide the following information for the foreign partnership's tax year: 1 Name, address, and identification number of agent (if any) in the United States 2 Check if the foreign partnership must file: Form 1042 Form 1065 Form 8804 Service Center where Form 1065 is filed: A Name and address of person(s) with custody of the books and records of the foreign partnership, and the location of such books and records, if different 3 Name and address of foreign partnership's agent in country of organization, if any Aztec Financial Services (Jersey) LTD Aztec Group House, IF6, The Esplanade St. Helier, Jersey JE4 During the tax year, did the foreign partnership pay or accrue any interest or royalty for which the deduction is not X No allowed under section 267A? See instructions If "Yes," enter the total amount of the disallowed deductions X No 6 Is the partnership a section 721(c) partnership, as defined in Regulations section 1.721(c)-1(b)(14)? Yes 7 Were any special allocations made by the foreign partnership? Enter the number of Forms 8858, Information Return of U.S. Persons With Respect to Foreign Disregarded Entities (FDEs) and Foreign Branches (FBs), attached to this return. See instructions How is this partnership classified under the law of the country in which it's organized? Partnership 10 a Does the filer have an interest in the foreign partnership, or an interest indirectly through the foreign partnership, that's a separate unit under Regulations section 1.1503(d)-1(b)(4) or part of a combined separate unit under Regulations section X No 1.1503(d)-1(b)(4)(ii)? If "No," skip question 10b b If "Yes," does the separate unit or combined separate unit have a dual consolidated loss, as defined in Regulations No section 1.1503(d)-1(b)(5)(ii)? 11 Does this partnership meet both of the following requirements? 1. The partnership's total receipts for the tax year were less than \$250,000. 2. The value of the partnership's total assets at the end of the tax year was less than \$1 million. Yes If "Yes," don't complete Schedules L, M-1, and M-2. For Privacy Act and Paperwork Reduction Act Notice, see the separate instructions. Form 8865 (2023)

LHA 310651 10-27-23

Form 8865 (2023)

#### **SCHEDULE 0** (Form 8865)

Transfer of Property to a Foreign Partnership (Under Section 6038B)

(Rev. October 2021)

OMB No. 1545-1668

► Attach to Form 8865. See the Instructions for Form 8865. Department of the Treasury Internal Revenue Service ► Go to www.irs.gov/Form8865 for instructions and the latest information. Name of transferor Filer's identifying number New Hampshire Charitable Foundation 02-6005625 EIN (if any) Reference ID number (see instr) Name of foreign partnership Highland Europe Technology Growth 98-1659261 1a Is the partnership a section 721(c) partnership (as defined in Regulations section 1.721(c)-1(b)(14))? See instructions Yes b If "Yes," was the gain deferral method applied to avoid the recognition of gain upon the contribution of property? Yes Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any X No time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)? Part I Transfers Reportable Under Section 6038B (g) Fair market value Cost or other Section 704(c) Type of property Date of Description Recovery period Gain recognized on date of transfer transfer of property allocation method on transfer basis Cash 12/31/23 482,549. Stock, notes receivable and payable, and other securities Inventory **Tangible** property used in trade or business Intangible property described in section 197(f)(9) Intangible property, other than intangible property described in section 197(f)(9) Other property Totals 482,549. .0000 .2930 % Enter the transferor's percentage interest in the partnership; (a) Before the transfer (b) After the transfer Supplemental Information Required To Be Reported (see instructions): Consideration received included interest in Highland Europe Technology Growth V, LP Part II Dispositions Reportable Under Section 6038B (f) Depreciation (h) Depreciation Type of Date of Date of Manner of Gain Gain allocated recapture recognized by recapture allocated property original disposition disposition to partner partnership to partner

LHA For Paperwork Reduction Act Notice, see the Instructions for Form 8865.

\_ Yes Schedule 0 (Form 8865) 10-2021

X No

Is any transfer reported on this schedule subject to gain recognition under section 904(f)(3) or section 904(f)(5)(F)?

		<del></del>			
Form 8621	Addition	al Informati	ion 	S1	tatement 11
Name of Passive	Foreign Investment	Company or	Qualified	Electing Fu	und
Oaktree Opps XB	Holdco LTD				
Class of Stock	Number of Shares at Begining of Year	Change in Number of Shares	Date of Change	Number of Shares at End of Year	at End
Common Stock				.058	74,013.00
Form 8621	Addition	al Informati	ion	St	tatement 12
Name of Passive	Foreign Investment	Company or	Qualified	Electing F	und
Opps Hartree Man	ritime CTB LTD				
Class of Stock	Number of Shares at Begining of Year	Change in Number of Shares	Date of Change	Number of Shares at End of Year	Value of Shares Held at End of Year
Common Stock	<del></del>			.040	34.00
Form 8621	Addition	al Informati	ion	St	tatement 13
Name of Passive	Foreign Investment	Company or	Qualified	Electing F	und
Calypso Investme	ents Holdings LTD				<del></del>
	Number of Shares at Begining	Change in Number	Date of	Number of Shares at End	Value of Shares Held at End
Class of Stock	of Year	of Shares	Change	of Year	of Year

Form 8621	Additional Information	Statement 14
Name of Passive	Foreign Investment Company or Qualified	Electing Fund
OCM Pearl 2 Hold	lings LTD	
Class of Stock	Number of Shares Change at Begining in Number Date of of Year of Shares Change	Number Value of of Shares Shares Held at End at End of Year of Year
Common Stock		.046 28,793.00
Form 8621	Additional Information	Statement 15
Name of Passive OCM Orient Inves	Foreign Investment Company or Qualified stments PTE LTD	Electing Fund
Class of Stock	Number of Shares Change at Begining in Number Date of of Year of Shares Change	Number Value of of Shares Shares Held at End at End of Year of Year
Common Stock		.056 3,445.00
Form 8621	Additional Information	Statement 16
Name of Passive	Foreign Investment Company or Qualified	Electing Fund
Name of Passive OCM Jade LTD	Foreign Investment Company or Qualified	Electing Fund

Form 8621	Addition	al Informat:	ion	St	tatement 17
Name of Passive	Foreign Investment	Company or	Qualified	Electing Fu	ınd 
India FPI Holdi	ngs Singapore PTE L'	TD			
Class of Stock	Number of Shares at Begining of Year	Change in Number of Shares	Date of Change	Number of Shares at End of Year	Shares Held at End
Common Stock				.053	124,238.00
Form 8621	Addition	al Informat:	ion	St	tatement 18
Name of Passive	Foreign Investment	Company or	Qualified	Electing Fu	ınd
India AIF Trust PTE LTD	Holdings Singapore				
Class of Stock	Number of Shares at Begining of Year	Change in Number of Shares	Date of Change	Number of Shares at End of Year	Shares Held at End
Common Stock				.053	149,260.00
Form 8621	Addition	al Informat:	ion	St	catement 19
Name of Passive	Foreign Investment	Company or	Qualified	Electing Fu	ınd
India Manager H	oldings Singapore				
Class of Stock	Number of Shares at Begining of Year	Change in Number of Shares	Date of Change	Number of Shares at End of Year	Value of Shares Held at End of Year
Common Stock				.053	0.00

Form 8621	Addition	al Informat	ion 		Statement	20
Name of Passive Fo	reign Investment	Company or	Qualified	Electing	Fund	
OCM Harbour Invest	ments PTE LTD					
Class of Stock	Number of Shares at Begining of Year	Change in Number of Shares	Date of Change	Number of Share at End of Year	at End	eld
Common Stock				.05	3 68,609	.00
Form 8621	Addition	al Informat	ion		Statement	21
Name of Passive Fo	reign Investment	Company or	Qualified	Electing	Fund	
OCM Verde XI Inves	tments PTE LTD					
	tments PTE LTD  Number of Shares at Begining of Year	Change in Number of Shares	Date of Change	Number of Share at End of Year	at End	eld
Class of Stock	Number of Shares at Begining	in Number		of Share at End	s Shares H at End of Yea	leld l .r 
Class of Stock Common Stock	Number of Shares at Begining of Year	in Number	Change	of Share at End of Year	s Shares F at End of Yea	leld l .r 
Class of Stock Common Stock Form 8621	Number of Shares at Begining of Year  Addition	in Number of Shares	ion	of Share at End of Year	s Shares Fat End of Year 9 177,567	eld r .00
Class of Stock Common Stock Form 8621 Name of Passive Fo	Number of Shares at Begining of Year  Addition	in Number of Shares	ion	of Share at End of Year	s Shares Fat End of Year 9 177,567	r .00
Class of Stock	Number of Shares at Begining of Year  Addition	in Number of Shares	ion	of Share at End of Year	Shares Fat End of Year	eld r .000 22

Form 8621	Addition:	al Informat:	ion 	S1	tatement 2
Name of Passive Fo	oreign Investment	Company or	Qualified	Electing F	und
Grand XI Investmen	its PTE				
Class of Stock	Number of Shares at Begining of Year	Change in Number of Shares	Date of Change	Number of Shares at End of Year	at End
Common Stock				.020	205,021.0
Form 8621	Addition	al Informat:	ion	S	tatement 2
Name of Passive Fo	oreign Investment	Company or	Qualified	Electing F	und
OCM Ferrero Invest	ments PTE LTD				
	Number of Shares at Begining of Year	Change in Number of Shares	Date of Change	Number of Shares at End of Year	at End
Class of Stock	Number of Shares at Begining	in Number		of Shares at End	Shares Held at End of Year
Class of Stock Common Stock	Number of Shares at Begining of Year	in Number	Change ———	of Shares at End of Year .053	Shares Held at End of Year
Class of Stock  Common Stock  Form 8621	Number of Shares at Begining of Year  Addition	in Number of Shares al Informat:	Change ion	of Shares at End of Year .053	Shares Held at End of Year 68,441.00
Class of Stock Common Stock Form 8621 Name of Passive Fo	Number of Shares at Begining of Year Additiona	in Number of Shares al Informat:	Change ion	of Shares at End of Year .053	Shares Held at End of Year 68,441.00
Class of Stock Common Stock Form 8621 Name of Passive Form China Direct A	Number of Shares at Begining of Year Additiona	in Number of Shares al Informat:	Change ion	of Shares at End of Year .053	Shares Held at End of Year 68,441.00 tatement 25 und Value of

Form 8621	Addition	al Informat:	ion 	St	tatement 26
Name of Passive Fo	reign Investment	Company or	Qualified	Electing Fu	ınd
OCM Lee Topco SARL					<del></del>
Class of Stock	Number of Shares at Begining of Year	Change in Number of Shares	Date of Change	at End	Value of Shares Held at End of Year
Common Stock				.056	0.00
Form 8621	Addition	al Informat:	ion	St	tatement 27
Name of Passive Fo	reign Investment	Company or	Qualified	Electing Fu	ınd
OCM Sirius Aviation	n Opportunities				
Class of Stock	Number of Shares at Begining of Year	Change in Number of Shares	Date of Change	at End	Value of Shares Held at End of Year
Common Stock				.056	34,103.00
Form 8621	Addition	al Informat:	ion	St	tatement 28
Name of Passive Fo	reign Investment	Company or	Qualified	Electing Fu	ınd
Name of Passive For ITA Hotel Investment SARL		Company or	Qualified	Electing Fu	ınd
ITA Hotel Investmen		Change in Number of Shares	Qualified  Date of Change	Number of Shares at End of Year	 Value of

Form 8621	Addition	al Informat	ion	St	tatement 29
Name of Passive Fo	reign Investment	Company or	Qualified	Electing F	und
ITA Hotel Investme: SARL	nts (Arsenale)				<del></del>
Class of Stock	Number of Shares at Begining of Year	Change in Number of Shares	Date of Change	at End	Value of Shares Held at End of Year
Common Stock				.015	5,483.00
Form 8621	Addition	al Informat	ion	S	tatement 30
Name of Passive Fo	reign Investment	Company or	Qualified	Electing F	und
ITA Hotel Investme: (Arsenale) SARL	nts Debtco				<del></del>
Class of Stock	Number of Shares at Begining of Year	Change in Number of Shares	Date of Change	at End	Shares Held
Common Stock				.015	0.00
Form 8621	Addition	al Informat	ion	St	tatement 31
Name of Passive Fo	reign Investment	Company or	Qualified	Electing F	und
OCM Luxembourg Mar	co Holdings SARL				
				NT1	1 C
Class of Stock	Number of Shares at Begining of Year	Change in Number of Shares	Date of Change	Number of Shares at End of Year	Value of Shares Held at End of Year

Form 8621	Addition	al Informat:	ion 	St	tatement 32
Name of Passive For	eign Investment	Company or	Qualified	Electing Fu	ınd
Modern Living Devel	opments Holding	s			<del></del>
Class of Stock	Number of Shares at Begining of Year	Change in Number of Shares	Date of Change	Number of Shares at End of Year	
Common Stock				.021	4,370.00
Form 8621	Addition	al Informat:	ion	St	tatement 33
Name of Passive For	eign Investment	Company or	Qualified	Electing Fu	ınd
Pembroke Developmen	ts Topco SARL				
Class of Stock	Number of Shares at Begining of Year		Date of Change	Number of Shares at End of Year	Value of Shares Held at End of Year
Common Stock				.021	0.00
Common Stock Form 8621	Addition	al Informat:	ion		0.00
				St	tatement 34
Form 8621	eign Investment			St	tatement 34
Form 8621  Name of Passive For	eign Investment			St	tatement 34

Form 8621	Addition	al Informat	ion		tatement 3
Name of Passive For	reign Investment	Company or	Qualified	Electing Fu	ınd 
Canopus Aviation Ho Activity Company	oldings Designat	ed			
Class of Stock	Number of Shares at Begining of Year	a	Date of Change	of Shares at End	Value of Shares Hel at End of Year
Common Stock				.056	34,103.0
Form 8621	Addition	al Informat	ion	St	tatement 3
Name of Passive For OCM Luxembourg Suns		Company or	Qualified	Electing Fu	ınd 
	Number			Number	Value of
Class of Stock	of Shares at Begining of Year	~ ~1	Date of Change	at End	Shares Hel
<del></del>	at Begining	in Number		at End	Shares Hel at End of Year
Class of Stock Common Stock Form 8621	at Begining of Year ————	in Number	Change ———	at End of Year .008	Shares Hel at End of Year
Common Stock	at Begining of Year ————————————————————————————————————	in Number of Shares	Change ion	at End of Year .008	Shares Hel at End of Year 4,340.0
Common Stock  Form 8621  Name of Passive Form	at Begining of Year Addition	in Number of Shares	Change ion	at End of Year .008	Shares Hel at End of Year 4,340.0
Common Stock Form 8621	at Begining of Year Addition	in Number of Shares	Change ion	at End of Year .008	Shares Hel at End of Year  4,340.0  tatement 3  und  Value of

Form 8621	Addition	al Informat	ion 	S1	tatement 38
Name of Passive Fo	oreign Investment	Company or	Qualified	Electing F	und
OCM Redwood Asset Holding SARL	Management				
Class of Stock	Number of Shares at Begining of Year		Date of Change	at End	Shares Held
Common Stock					0.00
Form 8621	Addition	al Informat	ion	St	tatement 39
Name of Passive Fo	oreign Investment	Company or	Qualified	Electing F	und
OCM Sprite II SARI	<u> </u>				
Class of Stock	Number of Shares at Begining of Year		Date of Change	of Shares at End	
Common Stock				.028	0.00
Form 8621	Addition	al Informat	ion	S	tatement 40
Name of Passive Fo	oreign Investment	Company or	Qualified	Electing F	und
ITA Hotel Investme (Arsenale) SARL	ents Debtco 2				
	Number of Shares	Change	Data of	Number of Shares at End	Value of Shares Held at End
Class of Stock	at Begining of Year	in Number of Shares	Date of Change	of Year	of Year

Form 8621	Addition	al Informat:	ion 	St	tatement 41
Name of Passive	Foreign Investment	Company or	Qualified	Electing Fu	ınd
Voussoir RE LTD					<del></del>
Class of Stock	Number of Shares at Begining of Year		Date of Change	of Shares at End	
Common Stock				.006	7,967.00
Form 8621	Additiona	al Informat:	ion	St	tatement 42
Name of Passive	Foreign Investment	Company or	Qualified	Electing Fu	ınd
Oaktree Opps XB	VMO II LTD				
Class of Stock	Number of Shares at Begining of Year	Change in Number of Shares	Date of Change	of Shares at End	
Common Stock				.056	1.00
Form 8621	Additiona	al Informat:	ion	St	tatement 43
Name of Passive	Foreign Investment	Company or	Qualified	Electing Fu	ınd
Oakstar Cargo Op	pportunities SARL				<del></del>
Class of Stock	Number of Shares at Begining of Year	Change in Number of Shares	Date of Change	Number of Shares at End of Year	Value of Shares Held at End of Year

Form 8621	Addition	al Informat	ion	St	tatement 44
Name of Passive	Foreign Investment	Company or	Qualified	Electing Fu	und
Sector RE V LTD					
Class of Stock	Number of Shares at Begining of Year	Change in Number of Shares	Date of Change	Number of Shares at End of Year	at End
Common Stock				.013	4,700.00
Form 8621	Addition	al Informat	ion	St	tatement 45
Name of Passive	Foreign Investment	Company or	Qualified	Electing Fu	und
London Bridge 2	PCC LTD				
Class of Stock	Number of Shares at Begining of Year	Change in Number of Shares	Date of Change	Number of Shares at End of Year	Value of Shares Held at End of Year
				.013	
Common Stock				•013	7,455.00
Common Stock Form 8621	Addition	al Informat	ion		7,455.00 tatement 46
Form 8621	Addition Foreign Investment			St	tatement 46
Form 8621	Foreign Investment			St	tatement 46
Form 8621  Name of Passive	Foreign Investment			St	tatement 46  und  Value of

		<del></del>			
Form 8621	Addition	al Informat:	ion	St	tatement 47
Name of Passive For	reign Investment	Company or	Qualified	Electing Fu	ınd
India FPI XI Holdin	ngs Singapore PT	E LTD			
Class of Stock	Number of Shares at Begining of Year	Change in Number of Shares	Date of Change	Number of Shares at End of Year	at End
Common Stock				.018	22,782.00
Form 8621	Addition	al Informat:	ion	St	tatement 48
Name of Passive For	reign Investment	Company or	Qualified	Electing Fu	ınd
prite 2021-1 Holdin Activity Company	ngs Designated				
Class of Stock	Number of Shares at Begining of Year	Change in Number of Shares	Date of Change	Number of Shares at End of Year	at End
Common Stock				.028	0.00
Form 8621	Addition	al Informat:	ion	St	tatement 49
Name of Passive For	reign Investment	Company or	Qualified	Electing Fu	ınd
Oaktree Maritime Fi	inance Holdings	10B LTD			
Class of Stock	Number of Shares at Begining of Year	Change in Number of Shares	Date of Change	Number of Shares at End of Year	at End
Common Stock				.056	36,555.00

		<del></del>				
Form 8621	Addition	al Informat	ion 	S:	tatement	50
Name of Passive For	reign Investment	Company or	Qualified	Electing F	und 	
OCM Opps XB Chile I (Cayman) LP	Loan Holdings					
Class of Stock	Number of Shares at Begining of Year	Change in Number of Shares	Date of Change	Number of Shares at End of Year	at End	eld l
Common Stock				.047	91,187	.00
Form 8621	Addition	al Informat	ion	St	tatement	51
Name of Passive Formandor OCM Opps Nustar CT		Company or	Qualified	Electing F	und ——	
Class of Stock	Number of Shares at Begining of Year	Change in Number of Shares	Date of Change	Number of Shares at End of Year	Value o Shares H at End of Yea	eld l
Common Stock				.125	119	.00
Form 8621	Addition	al Informat	ion	St	tatement	52
Name of Passive For	reign Investment	Company or	Qualified	Electing F	und	
OCM Opps Weather C	IB, LTD					
Class of Stock	Number of Shares at Begining of Year	Change in Number of Shares	Date of Change	Number of Shares at End of Year	Value o Shares H at End of Yea	eld l
Common Stock				.107	150	.00

Form 8621 Additional Information 53 Statement Name of Passive Foreign Investment Company or Qualified Electing Fund OCM Engy Holdings IV CTD, LLC Number Number Value of of Shares Shares Held of Shares Change at Begining in Number Date of at End at End Class of Stock of Year of Shares Change of Year of Year

Common Stock		.125 5,076.00
Form 8865	Affiliation Schedule	Statement 54
Name	Address	Ck Total if Ordinary For- Identifying Income eign Number or (Loss) P'sh
OPPS XB Source Hldgs	333 South Grand Ave. Fl 28	83-1752689
OCM Source Holdings II, LP	Los Angeles, CA 90071 333 South Grand Ave. F1 28	82-3786219
OCM Opps IBRW Holdings, PT	Los Angeles, CA 90071 333 South Grand Ave. F1 28	85-0667023
OCM IMCR Holdings,	Los Angeles, CA 90071 333 South Grand Ave. F1 28	85-0668208
OCM Opps UWM Holdings PT	Los Angeles, CA 90071 333 South Grand Ave. F1 28	84-3755394
OCM Engy Holdings	Los Angeles, CA 90071 333 South Grand Ave. F1 28	85-1672288
OCM XAN Holdings, PT	Los Angeles, CA 90071 333 South Grand Ave. F1 28 Los Angeles, CA 90071	84-3822792
OCM Acres XAN Holdings, PT	333 South Grand Ave. Fl 28	84-3827548
OPPS XB Quid Holdings PT	Los Angeles, CA 90071 333 South Grand Ave. Fl 28	85-2753424
OCM Quadpay Holdings, LP	Los Angeles, CA 90071 333 South Grand Ave. F1 28	85-0667949
OCM Opps ELF XB Hldgs PT	Los Angeles, CA 90071 333 South Grand Ave. F1 28	85-1898779
	Los Angeles, CA 90071	

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OPPS XB PSAV PT, LP		South Grand Angeles, CA		28	85-4139078
OCM PSAV Holdings, LP		South Grand		28	85-3507292
ПЕ	T.O.C	Angeles, CA	90071		
OCM Opps Weather Hldgs PT		South Grand		28	85-1761056
	Los	Angeles, CA	90071		
OPPS XB EGWL PT		South Grand		28	87-1685830
		Angeles, CA			
OCM EGWL Holdings		South Grand		28	87-3016413
_	Los	Angeles, CA	90071		
OPPS XB Terminal PT	333	South Grand	Ave. Fl	28	86-1912580
		Angeles, CA			
OPPS Terminal	333	South Grand	Ave. Fl	28	86-2156806
Holdings		_			
		Angeles, CA			
OPPS XB OCW PT		South Grand		28	85-4239700
		Angeles, CA			
OPPS OCW Holdings		South Grand		28	85-4185334
		Angeles, CA		0.0	06 1600161
OCM AZR Holdings II	333	South Grand	Ave. FI	28	86-1639461
PT	<b>T</b>	3	00071		
3		Angeles, CA		20	06 1070655
Azorra Aviation	333	South Grand	Ave. Fi	28	86-1872655
Holdings	Tog	Angeles, CA	00071		
OCM Opps XB MILB		South Grand		20	86-1249010
Holdings	333	South Grand	Ave. FI	20	00-1249010
norungs	T.Og	Angeles, CA	90071		
OCM MILB Holdings		South Grand		28	86-1247589
oon manage		Angeles, CA			00 1217303
OPPS XB INTF PT		South Grand		28	86-1601095
		Angeles, CA			
OCM INTF Holdings		South Grand		28	86-1601589
		Angeles, CA			
OPPS XB HCIP PT		South Grand		28	86-1705130
	Los	Angeles, CA	90071		
OCM HCIP Holdings		South Grand		28	86-1704252
		Angeles, CA			
Opps XB VMO Holdings	333	South Grand	Ave. Fl	28	86-1601835
I					
		Angeles, CA			
OCM VMO Holdings I		South Grand		28	86-1705752
		Angeles, CA			06 4504406
XB OTWSOU Terrier	333	South Grand	Ave. FI	28	86-1731486
Holdings	T	31 03	00071		
OF MOOI Formion		Angeles, CA		20	06 2264060
OT WSOU Terrier	333	South Grand	Ave. FI	40	86-2264860
Holdings	Toa	Angelog Ca	90071		
OPPS XB TRSTR PT		Angeles, CA South Grand		28	86-2240905
OLIO VD IVDIV LI		Angeles, CA		20	00 4440903
OCM TRSTR Holdings		South Grand		28	86-3611052
		Angeles, CA			30 3011032
		-327, 311	<b></b>		

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OPPS XB GLWY PT		South Grand		28	86-2666763
OOM OLUM Birons		Angeles, CA		20	07 0016460
OCM GLWY Finance Holdings	333	South Grand	Ave. FI	<b>∠</b> 8	87-0816462
norarings	Los	Angeles, CA	90071		
OPPS XB ENLK PT		South Grand		28	86-3207508
		Angeles, CA			
OCM ENLK Holdings		South Grand		28	87-0829493
OPPS XB ITF PT		Angeles, CA South Grand		20	87-0921928
OPPS AB 11F P1		Angeles, CA		40	07-0921920
OCM ITF Holdings		South Grand		28	87-1526318
5		Angeles, CA			
OPPS XB OTG PT		South Grand		28	86-3645727
001 0000 000		Angeles, CA		0.0	05 1000554
OCM OPPS OTG Holdings	333	South Grand	Ave. FI	28	87-1028754
HOTATINGS	Los	Angeles, CA	90071		
OPPS XB ELVT PT		South Grand		28	87-0922215
		Angeles, CA			
OCM ELVT D Holdings		South Grand		28	87-1298152
		Angeles, CA			05 0554004
OPPS XB JB PT		South Grand		28	85-2751891
OPPS JB Holdings		Angeles, CA South Grand		28	87-2461811
orro ob nordings		Angeles, CA		20	07 2401011
OPPS XB MTL PT		South Grand		28	87-1686274
		Angeles, CA			
OCM MTL Holdings		South Grand		28	86-1695551
OPPS CB MT RNW PT		Angeles, CA South Grand		20	87-2374829
OPPS CB MI KNW PI		Angeles, CA		40	01-2314029
OCM MT RNW Holdings		South Grand		28	87-3321799
5	Los	Angeles, CA	90071		
OPPS XB RMBL	333	South Grand	Ave. F1	28	87-0817132
Holdings LLC	<b>.</b>	3	00071		
OCM ACE OPPS XB PT		Angeles, CA South Grand		2.0	97_1209730
LP	333	South Grand	Ave. FI	20	07-1290730
	Los	Angeles, CA	90071		
OCM ACE Holdings LLC	333	South Grand	Ave. Fl	28	86-1218650
		Angeles, CA			
OPPS XB AHT PT LP		South Grand		28	85-4141525
OPPS AHT Holdings		Angeles, CA South Grand		28	84-3859197
LLC	333	South Grand	Ave. FI	20	04-3039197
	Los	Angeles, CA	90071		
OPPS XB QDTH PT LP	333	South Grand	Ave. Fl	28	87-2375227
		Angeles, CA			
OPPS XB OCW MAV PT	333	South Grand	Ave. Fl	28	85-4141859
LP	Log	Angeles, CA	90071		
OCW MAV Holdings LLC				28	84-3822723
= <b></b>		Angeles, CA		-	, <b></b>
OCM RNWY Holdings		South Grand		28	84-2288011
LLC	<b>T</b> -	31 0-	00004		
	ьos	Angeles, CA	90071		

			_		
OCM OPPS Nustar Holldings	333	South Grand	Ave. Fl	28	85-0519775
OPPS 10B Storage	Los 333	Angeles, CA South Grand	90071 Ave. Fl	28	83-3143852
Oaktree Storage	Los 333	Angeles, CA South Grand	90071 Ave. Fl	28	83-3142629
Holdings	Log	Angeles, CA	90071		
OCM ENGY Holdings IV				28	84-3827582
OPPS Energy Trading XB PT	Los 333	Angeles, CA South Grand	90071 Ave. Fl	28	85-0692021
OPPS Energy Trading Hdgs V	Los 333	Angeles, CA South Grand	90071 Ave. Fl	28	85-1462051
OPPS ENGY Trding		Angeles, CA South Grand		28	85_07//737
HLDGS III				20	03-0744737
OPPS ENGY Trding	Los 333	Angeles, CA South Grand	90071 Ave. F1	28	85-4257098
HLDGS VII				20	03 123,030
OPPS ENGY Trdig HLDGS VIII	Los 333	Angeles, CA South Grand	90071 Ave. Fl	28	86-3207150
	Los	Angeles, CA	90071		
OPPS Energy Trad Hdgs IX		South Grand		28	87-4689382
OPPS Energy Trad Hdgs X	333	Angeles, CA South Grand	Ave. Fl	28	87-4772330
-		Angeles, CA			
OPPS Energy Trad Hdgs XI	333	South Grand	Ave. Fl	28	87-4772774
_		Angeles, CA		2.0	07 1000001
OCM Andro Holdings LP	333	South Grand	Ave. Fl	28	87-1299991
0000 000 1 1 000 10	Los	Angeles, CA	90071	0.0	05 1561055
OPPS XB Andro PT LP		Angeles, CA		28	85-1761275
OPPS AP Holdings LLC	333	South Grand	Ave. Fl	28	87-3549588
OPPS XB AP PT LP	333	Angeles, CA South Grand Angeles, CA	Ave. Fl	28	87-3104709
OPPS BW Holdings LLC	333	South Grand	Ave. Fl	28	87-3515053
OPPS XB BW PT LP		Angeles, CA South Grand		28	87-3052056
OPPS XB CBL PT LP	333	Angeles, CA South Grand	Ave. Fl	28	87-1593287
OCM EPC Holdings LLC		Angeles, CA South Grand		28	87-3640279
_	Los	Angeles, CA	90071		
OPPS XB EPC PT LP		South Grand Angeles, CA		<b>∠</b> ၓ	87-3409737

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OCM XB Quid III PT LP				28	87-3834557
OPPS XB Quid III PT LP		Angeles, CA South Grand		28	87-3495646
OPPS SI Holdings LLC		Angeles, CA South Grand		28	88-1515802
OPPS XB Superior		Angeles, CA South Grand		28	88-2424288
Holdings		Angeles, CA			
OPPS TPC Holdings LP	Los	Angeles, CA	90071		88-2424215
OCM Tempo Holdings LLC				28	87-3494895
OPPS XB Tempo PT LP	333		Ave. Fl	28	87-3051203
OCM Veleta Holdings		Angeles, CA South Grand		28	87-3495033
LLC	Los	Angeles, CA	90071		
OPPS XB Veleta PT LP	333	South Grand	Ave. Fl	28	87-2373444
OCM VMO Holdings II LLC		Angeles, CA South Grand		28	86-1705460
OT WSOU Terrier		Angeles, CA South Grand		20	86-3207698
Holding II				40	00-3207090
XB OT WSOU Terrier HLDG II		Angeles, CA South Grand		28	86-2241660
Oaktree OPPS Fund XB		Angeles, CA South Grand		28	98-1551142
AIF		Angeles, CA		_ ~	
OCM OPPS XB AIF Holdings		South Grand		28	82-4541514
Opps XB AEP Holdings		Angeles, CA		28	88-3919623
	Los	Angeles, CA	90071		
OCM AEP Holdings LLC	Los	Angeles, CA	90071		88-2618597
Opps XB THBV Holdings PT		South Grand		28	88-2424615
Opps THBV Holdings LLC		Angeles, CA South Grand		28	88-2404554
OCM XB CPA Holdings	333	Angeles, CA South Grand	Ave. Fl	28	88-2737970
OCM Frnt Holdings		Angeles, CA South Grand		28	88-2618692
Opps XB Dbld		Angeles, CA South Grand		28	88-2425353
Holdings PT		Angeles, CA			
	-05	-migorob, CA	J 0 0 / I		

new nampanine char.	ıcabı	ic roundactor	••			02-0003023
Opps XB Aera D Holdings PT	333	South Grand	Ave. Fl	28	88-3919238	
OCM Aera D Holdings		Angeles, CA South Grand		28	88-2758222	
Opps XB Aera E Holdings PT		Angeles, CA South Grand		28	88-3919201	
OCM Aera E Holdings		Angeles, CA South Grand		28	88-2759138	
Opps XB RB Holdings	333	Angeles, CA South Grand Angeles, CA	Ave. F1	28	88-4356219	
OCM Opps ALB Holdings PT L		South Grand		28	84-3827753	
J	Los	Angeles, CA	90071			
Form 8865		Affiliation	Schedule	<del></del>		Statement 55
						Ck
					Identifying	Total if Ordinary For-
Name		Addres	ss		Number	or (Loss) P'sh
Oaktree Opps Fund XB Hdgs				28	98-1412648	
Hdgs Oaktree Opps Fund XB	Los	Angeles, CA	90071		98-1412648 82-4547786	
Hdgs	Los 333 Los	Angeles, CA South Grand Angeles, CA	90071 Ave. Fl 90071	28		
Hdgs Oaktree Opps Fund XB Hdgs OCM Luxembourg X-XB	Los 333 Los 333	Angeles, CA South Grand Angeles, CA	90071 Ave. F1 90071 Ave. F1 90071	28	82-4547786	
Hdgs Oaktree Opps Fund XB Hdgs OCM Luxembourg X-XB GP SAR OCM LCCG Holdings LTD OCM Montrose	Los 333 Los 333 Los 333	Angeles, CA South Grand Angeles, CA South Grand Angeles, CA	90071 Ave. F1 90071 Ave. F1 90071 Ave. F1	28 28 28	82-4547786 98-1441266	
Hdgs Oaktree Opps Fund XB Hdgs OCM Luxembourg X-XB GP SAR OCM LCCG Holdings LTD	Los 333 Los 333 Los 333 Los 333	Angeles, CA South Grand Angeles, CA South Grand Angeles, CA South Grand Angeles, CA South Grand Angeles, CA South Grand	90071 Ave. F1 90071 Ave. F1 90071 Ave. F1 90071 Ave. F1	28 28 28 28	82-4547786 98-1441266 98-1207501	
Oaktree Opps Fund XB Hdgs  OCM Luxembourg X-XB GP SAR  OCM LCCG Holdings LTD  OCM Montrose Holdings  Opps RP Holdings  OCM Montrose II	Los 333 Los 333 Los 333 Los 333 Los	Angeles, CA South Grand Angeles, CA South Grand Angeles, CA South Grand Angeles, CA South Grand	90071 Ave. F1 90071 Ave. F1 90071 Ave. F1 90071 Ave. F1 90071	28 28 28 28	82-4547786 98-1441266 98-1207501 83-2273701	
Oaktree Opps Fund XB Hdgs  OCM Luxembourg X-XB GP SAR  OCM LCCG Holdings LTD  OCM Montrose Holdings  Opps RP Holdings	Los 333 Los 333 Los 333 Los 333 Los 333	Angeles, CA South Grand Angeles, CA South Grand Angeles, CA South Grand Angeles, CA South Grand Angeles, CA South Grand Angeles, CA South Grand Angeles, CA South Grand	90071 Ave. F1 90071 Ave. F1 90071 Ave. F1 90071 Ave. F1 90071 Ave. F1 90071 Ave. F1	28 28 28 28 28	82-4547786 98-1441266 98-1207501 83-2273701 83-1520028	
Oaktree Opps Fund XB Hdgs  OCM Luxembourg X-XB GP SAR  OCM LCCG Holdings LTD  OCM Montrose Holdings  Opps RP Holdings  OCM Montrose II Holdings  OCM CBL Holdings LLC  OCM TMR Opps	Los 333 Los 333 Los 333 Los 333 Los 333 Los	Angeles, CA South Grand Angeles, CA South Grand Angeles, CA South Grand Angeles, CA South Grand Angeles, CA South Grand Angeles, CA South Grand Angeles, CA	90071 Ave. F1 90071 Ave. F1 90071 Ave. F1 90071 Ave. F1 90071 Ave. F1 90071 Ave. F1	28 28 28 28 28 28	82-4547786 98-1441266 98-1207501 83-2273701 83-1520028 85-0568788	
Oaktree Opps Fund XB Hdgs  OCM Luxembourg X-XB GP SAR  OCM LCCG Holdings LTD  OCM Montrose Holdings  Opps RP Holdings  OCM Montrose II Holdings  OCM CBL Holdings LLC	Los 333 Los 333 Los 333 Los 333 Los 333 Los 333	Angeles, CA South Grand	90071 Ave. F1 90071 Ave. F1 90071 Ave. F1 90071 Ave. F1 90071 Ave. F1 90071 Ave. F1 90071 Ave. F1	28 28 28 28 28 28 28	82-4547786 98-1441266 98-1207501 83-2273701 83-1520028 85-0568788 84-3781295	

OCM 99 Holdings LLC 333 South Grand Ave. Fl 28 82-4300594 Los Angeles, CA 90071

			_		
OCM Acosta Holdings LLC	333	South Grand	Ave. Fl	28	84-1824849
OCM BKV Holdings LLC	333		Ave. Fl	28	85-2087196
OCM Glwy Holdings LLC		Angeles, CA South Grand		28	87-0816720
Oaktree THR Holdings	Los 333	Angeles, CA South Grand	90071 Ave. F1	28	86-1612969
Oaktree Trstr Holdings II	333	Angeles, CA South Grand	Ave. F1	28	86-3643178
OCM USM Holdings LLC	333		Ave. Fl	28	87-2462376
OCM XB-C2 Chile Holdings		Angeles, CA South Grand		28	85-2381643
OCM PR Pwr Holdings		Angeles, CA South Grand		28	87-0828609
OCM Opps GTM Holdings LLC		Angeles, CA South Grand		28	86-1695091
Opps TPIC Holdings		Angeles, CA South Grand		28	87-3016264
OCM Hlth Holdings		Angeles, CA South Grand		28	87-1593438
OCM Aspiration Holdings LL		Angeles, CA South Grand		28	87-3409869
OCM Velocity Holdings LLC		Angeles, CA South Grand		28	87-3495319
OCM Chsx Holdings	333	Angeles, CA South Grand Angeles, CA	Ave. Fl	28	47-3362955
Opps Reception Holdings I	333	South Grand	Ave. F1	28	87-3549827
Opps Precision Holdings	Los 333	Angeles, CA South Grand	90071 Ave. Fl	28	87-3514658
OCM Elvt E Holdings LLC		Angeles, CA South Grand		28	87-1298429
OCM Technology Holdings		Angeles, CA South Grand		28	81-3154851
OCM Utmost Holdings LTD		Angeles, CA South Grand		28	98-1373099
Oaktree Opps (Singapore)		Angeles, CA South Grand		28	98-1437219
(pringapore)	Los	Angeles, CA	90071		

OCM URS Holdings LLC	333 South Grand Ave. Fl 28 Los Angeles, CA 90071	92-0759088
Opps ENC Holdings LLC	333 South Grand Ave. Fl 28	87-4770188
ABC Holdco SARL	Los Angeles, CA 90071 333 South Grand Ave. Fl 28 Los Angeles, CA 90071	98-1697718

Return by a U.S. Transferor of Property

to a Foreign Corporation

▶ Go to www.irs.gov/Form926 for instructions and the latest information.

OMB	No.	1545-0026

► Attach to your income tax return for the year of the transfer or distribution.

Part I U.S. Transferor Information (see instructions)	iou ibuuoiii		
Name of transferor		Identifying numbe	(see instructions)
New Hampshire Charitable Foundation			,
		02-60056	
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation	ation?	Yes	X No
2 If the transferor was a corporation, complete questions 2a through 2d.			
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368			▼
five or fewer domestic corporations?			X No
<b>b</b> Did the transferor remain in existence after the transfer?  If not, list the controlling shareholder(s) and their identifying number(s).		LAL Yes	∟ No
- Triot, list the controlling shareholder(s) and their identitying humber(s).			
Controlling shareholder	I	dentifying number	
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent of	corporation?	Yes	X No
If not, list the name and employer identification number (EIN) of the parent corporation.	corporation:		140
	FIN		
Name of parent corporation	EIN	of parent corporation	on
27 / 2			
N/A			X No
d Have basis adjustments under section 367(a)(4) been made?		Yes	L <b>∆</b> No
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as	such under s	ection 367).	
complete questions 3a through 3d.		,,	
a List the name and EIN of the transferor's partnership.			
Name of partnership		EIN of partnership	
	•		
Davidson Kempner Institutional Partners LP	13-359	7020	
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?		X Yes	□ No
c Is the partner disposing of its <b>entire</b> interest in the partnership?			X No
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an establis			
securities market?		Yes	X No
Part II Transferee Foreign Corporation Information (see instructions)			
4 Name of transferee (foreign corporation)	5	a Identifying number	er, if any
DKIP (Cayman) II LP			
6 Address (including country)	51	<b>b</b> Reference ID num	hor
190 Elgin Avenue	b Reference in hum	Dei	
George Town, Grand Cayman KY 1-9005 Cayman Islands	τ	U-27	
7 Country code of country of incorporation or organization	L		
CJ			
8 Foreign law characterization (see instructions)			
Corporation		Г	<b>V</b>
9 Is the transferee foreign corporation a controlled foreign corporation?			X No

	Regarding Tran	sfer of Property (see in	nstructi	ons)		
Section A - Cash		<i>a</i> .			, n	
Type of property	(a) Date of transfer	<b>(b)</b> Description of property		(c) larket value on e of transfer	(d) Cost or other basis	<b>(e)</b> Gain recognized on transfer
Cash	12/31/2023	, , ,		941,671.		
10 Was cash the only pro If "Yes," skip the rema	ainder of Part III and					X Yes No
		n intangible property	subjec			(5)
Type of property	(a) Date of transfer	<b>(b)</b> Description of property		(c) larket value on e of transfer	(d) Cost or other basis	<b>(e)</b> Gain recognized on transfer
Stock and						
securities			<u> </u>			
Inventory						
Other property (not listed under another category)						
			+	+		
Property with			+			
built-in loss			+			
Totals						
Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  12 a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  If "Yes," go to line 12b.  b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation?  If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.  c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?  If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.  d Enter the transferred loss amount included in gross income as required under section 91  S Did the transferor transfer property described in section 367(d)(4)?  If "No," skip Section C and questions 14a through 15.						
Section C - Intangible	e Property Subje	ect to Section 367(d)		<u> </u>		<del></del>
Type of property	<b>(a)</b> Date of transfer	<b>(b)</b> Description of property	(c) Useful life	(d) Arm's length pri on date of trans		(f) Income inclusion for year of transfer
			+			+
			+			+
Property described in sec. 367(d)(4)						
Totals						+
Totals				l		

Form	1926 (Rev. 11-2018) New Hampshire Charitable Foundation	02-6005625	Page <b>3</b>
b c	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii)   \$\Bigsim \\$  Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Yes Yes	No No No
	plemental Part III Information Required To Be Reported (see instructions)		
	nsideration received for non-controlling interest in DKIF	(Cayman)	II LP,
<u>a</u> (	Cayman Islands-based corporation.		
Da	at IV Additional Information Department Transfer of Dranarty (see instructions)		
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before $0.369\%$ (b) After $0.369\%$		
17	Type of nonrecognition transaction (see instructions) ▶ 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.	Yes	X No
	Gain recognition under section 904(f)(3)		X No
b	Gain recognition under section 904(f)(5)(F)		X No
C	Recapture under section 1503(d)		X No
	Exchange gain under section 987		X No
19	Did this transfer result from a change in entity classification?  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)		X No
20 a	If "Yes," complete lines 20b and 20c.	Lites	LZY INO
h	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)	<b>•</b> •	
b	Did the domestic corporation not recognize gain or loss on the distribution of property because the	• •	
C	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	□ No
21	property was used in the conduct of 0.5. trade or business under negulations section 1.507(e)-2(b)(2)?	L 1eS	LINU

Yes

### Return by a U.S. Transferor of Property

to a Foreign Corporation

▶ Go to www.irs.gov/Form926 for instructions and the latest information. ▶ Attach to your income tax return for the year of the transfer or distribution. OMB No. 1545-0026

Pa	rt I U.S. Transferor Information (see instructions)	_
	e of transferor	Identifying number (see instructions)
Ne	ew Hampshire Charitable Foundation	
		02-6005625
1	Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?	Yes X No
2	If the transferor was a corporation, complete questions 2a through 2d.	
а	If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by	
	five or fewer domestic corporations?	
b	Did the transferor remain in existence after the transfer?	X Yes No
	If not, list the controlling shareholder(s) and their identifying number(s).	
	Controlling shareholder	Identifying number
	•	
С	If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation	?Yes X No
	If not, list the name and employer identification number (EIN) of the parent corporation.	
	Name of parent corporation El	N of parent corporation
		•
N	/ A	
		Yes X No
u	Have basis adjustments under section 367(a)(4) been made?	Les Lil No
3	If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under	section 367)
•	complete questions 3a through 3d.	Coot.o.,
а	List the name and EIN of the transferor's partnership.	
	Name of partnership	EIN of partnership
N,		
b	Did the partner pick up its pro rata share of gain on the transfer of partnership assets?	Yes No
	Is the partner disposing of its <b>entire</b> interest in the partnership?	Yes No
d	Is the partner disposing of an interest in a limited partnership that is regularly traded on an established	
_	securities market?	Yes No
	rt II Transferee Foreign Corporation Information (see instructions)	
4	Name of transferee (foreign corporation)	5a Identifying number, if any
73. 7	ACD Mar Exampt Investors VI ID	981525059
	ACP Tax Exempt Investors VI, LP	
	Address (including country) E Embarcadero Center, 16th Floor	<b>5b</b> Reference ID number
	n Francisco, CA 94111	926-5
7 Ci	Country code of country of incorporation or organization  T	
8	Foreign law characterization (see instructions)	
	imited Partnership	
9	Is the transferee foreign corporation a controlled foreign corporation?	Yes X No
	4 04 04 09 LUA For Department Poduation Act Nation and congrete instructions	Form 926 (Poy 11 2019)

	Regarding Tran	sfer of Property (see i	nstructi	ions)		
Section A - Cash		4.				
Type of property	<b>(a)</b> Date of transfer	<b>(b)</b> Description of property		(c) narket value on e of transfer	<b>(d)</b> Cost or other basis	<b>(e)</b> Gain recognized on transfer
Cash	12/31/2023	1 1 7		729,024.		
10 Was cash the only pro	ainder of Part III and o					X Yes No
Section B - Other Pro	pperty (otner tha		subjec	(c)	(d)	(e)
Type of property	Date of transfer	<b>(b)</b> Description of property		narket value on e of transfer	Cost or other basis	Gain recognized on transfer
Stock and						<del> </del>
securities						
Inventory						
Other property (not listed under another category)						
						-
Property with						
built-in loss						
Totals						
recognition agreement was filed?  12 a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  If "Yes," go to line 12b.  b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation?  If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.  c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?  If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.  d Enter the transferred loss amount included in gross income as required under section 91  S No  If "No," skip Section C and questions 14a through 15.						
Section C - Intangible	Property Subje	ect to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length pri on date of trans		(f) Income inclusion for year of transfer
						+
Property described						
in sec. 367(d)(4)						
			-	1		+
Tatala				<del>                                     </del>		+
Totals					IF	<u> </u>

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b c	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii)   **Mas any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?		Yes Yes Yes	No No No
	plemental Part III Information Required To Be Reported (see instructions)			
	nsideration received for non-controlling interest in AACI		x Exemp	t
Inv	vestors VI, LP, a Cayman Islands-based limited partnershi	ip.		
_				
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)			
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before $0.900\%$ (b) After $0.900\%$			
17	Type of nonrecognition transaction (see instructions) ▶ 351			
18	Indicate whether any transfer reported in Part III is subject to any of the following.			
а	Gain recognition under section 904(f)(3)		Yes	X No
b	Gain recognition under section 904(f)(5)(F)		Yes	X No
С	Recapture under section 1503(d)		Yes	X No
d	Exchange gain under section 987		Yes	X No
19	Did this transfer result from a change in entity classification?		Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)		Yes	X No
	If "Yes," complete lines 20b and 20c.			
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)		\$	
С	1 3 3			
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes	☐ No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			

Yes

Return by a U.S. Transferor of Property

to a Foreign Corporation

▶ Go to www.irs.gov/Form926 for instructions and the latest information. ▶ Attach to your income tax return for the year of the transfer or distribution. OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)						
Name of transferor		Identifying number (see instructions)				
New Hampshire Charitable Foundation						
		02-6	005			
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corpo	ration?	Ш	Yes	X	No	
2 If the transferor was a corporation, complete questions 2a through 2d.						
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 364)	B(c)) by					
five or fewer domestic corporations?			Yes	X	No	
b Did the transferor remain in existence after the transfer?			Yes		No	
If not, list the controlling shareholder(s) and their identifying number(s).						
Controlling shareholder	Ide	ntifying n	umber			
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent	corporation?	🗀	Yes	X	No	
If not, list the name and employer identification number (EIN) of the parent corporation.						
Name of parent corporation	EIN of	parent co	rporati	ion		
· · ·		•	•			
N/A						
			Yes	Х	No	
d Have basis adjustments under section 367(a)(4) been made?		$\Box$	res	21	] INO	
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as	such under sect	ion 367)				
complete questions 3a through 3d.	Such under Sect	1011 301),				
·						
a List the name and EIN of the transferor's partnership.						
Name of partnership	EIN	l of partne	ership			
N/A						
<b>b</b> Did the partner pick up its pro rata share of gain on the transfer of partnership assets?			Yes		No	
c Is the partner disposing of its <b>entire</b> interest in the partnership?			Yes		No	
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an estable						
securities market?			Yes		No	
Part II Transferee Foreign Corporation Information (see instructions)		····				
4 Name of transferee (foreign corporation)	5a I	dentifying	g numb	er, if a	any	
				•	•	
AACP Tax Exempt Investors V, LP	61	.18175	24			
6 Address (including country)	5b F	Reference	ID num	ber		
One Embarcadero Center, 16th Floor						
San Francisco, CA 94111	92	6-4				
7 Country code of country of incorporation or organization						
CJ						
8 Foreign law characterization (see instructions)	<del></del>					
Limited Partnership						
9 Is the transferee foreign corporation a controlled foreign corporation?			Yes	X	No	
324531 04-01-23 LHA For Paperwork Reduction Act Notice, see separate instructions.		Forr	n <b>926</b> (l	Rev. 1	1-2018)	

	Regarding Tran	<b>sfer of Property</b> (see i	instructi	ions)		
Section A - Cash			_			
Type of	(a) Date of	<b>(b)</b> Description of	Fair m	(c) narket value on	(d) Cost or other	<b>(e)</b> Gain recognized on
property	transfer	property		e of transfer	basis	transfer
Cash	12/31/2023			264,572.		
10 Was cash the only pro If "Yes," skip the rema		jo to Part IV.			C	X Yes No
Section B - Other Pro	perty (other tha	n intangible property	subjec	t to section 36		
Type of property	<b>(a)</b> Date of transfer	<b>(b)</b> Description of property		(c) narket value on te of transfer	(d) Cost or other basis	<b>(e)</b> Gain recognized on transfer
Stock and securities						
Inventory						
•						
Other property						
(not listed under						
another category)						
Property with						
built-in loss						
			_			
Totals						
<ul> <li>12 a Were any assets of a foreign corporation? If "Yes," go to line 12th b Was the transferor a continue to liming a branch the stransfere of the transferee foreign corporation. If "Yes," continue to liming a branch the transferee foreign corporation. If "Yes," continue to liming a branch the transferee of the transferred liming a branch the transferred liming. It is a branch to liming a branch the transferred liming a branch the transferred liming. It is a branch the transferred liming a branch the transferred liming a branch the transferred liming. It is a branch the transferred liming a branch the transferred liming a branch the transferred liming. It is a branch the transferred liming a branch the transferred liming a branch the transferred liming. It is a branch the transferred liming a branch the transferred</li></ul>	foreign branch (included)  domestic corporation at is a foreign disregate 12c. If "No," skip I transfer, was the done poration?  ne 12d. If "No," skip I oss amount included asfer property describ and questions 14a to the content of the state of the sta	that transferred substantiall urded entity) to a specified 1 ines 12c and 12d, and go to nestic corporation a U.S. shadine 12d, and go to line 13. in gross income as required ed in section 367(d)(4)?	y all of the 0%-owne o line 13. areholder	rded entity) transfe	n branch	Yes       No         Yes       No         Yes       No         Yes       No
Section C - intangible	Froperty Subje	ect to section sor(a)			1	
Type of property	<b>(a)</b> Date of transfer	<b>(b)</b> Description of property	(c) Useful life	(d) Arm's length price on date of transfe		(f) Income inclusion for year of transfer
				-		
			_			
			+			
Property described			+		+	
in sec. 367(d)(4)					+	
			+	<del> </del>	1	
				1		
			+	1	1	
 Totals					1	
Ισιαιο				1	F	

Form	1926 (Rev. 11-2018) New Hampshire Charitable Foundation	02-	6005625	Page <b>3</b>
b c	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii)   Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?		Yes Yes Yes	No No No
Sup	plemental Part III Information Required To Be Reported (see instructions)			
Coi	nsideration received for non-controlling interest in AACI	P Ta	x Exemp	t
Inv	vestors V, LP, a Cayman Islands-based limited partnership	<u>5.</u>		
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)			
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before $0.883\%$ (b) After $0.883\%$			
17	Type of nonrecognition transaction (see instructions) ▶ 351			
18	Indicate whether any transfer reported in Part III is subject to any of the following.			
а	Gain recognition under section 904(f)(3)		Yes	X No
b	Gain recognition under section 904(f)(5)(F)		Yes	X No
С	Recapture under section 1503(d)		Yes	X No
d	Exchange gain under section 987		Yes	X No
19	Did this transfer result from a change in entity classification?		Yes	X No
<b>2</b> 0 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)		Yes	X No
	If "Yes," complete lines 20b and 20c.			
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)	▶	\$	
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the			
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes	☐ No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			

Yes

Return by a U.S. Transferor of Property

to a Foreign Corporation

▶ Go to www.irs.gov/Form926 for instructions and the latest information. ▶ Attach to your income tax return for the year of the transfer or distribution. OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)					
Name of transferor		Identifying number (see instructions)			
New Hampshire Charitable Foundation		02-6005625			
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation that is not a controlled foreign corporation.	oration?	Ш	Yes	X No	
2 If the transferor was a corporation, complete questions 2a through 2d.					
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 36	8(c)) by				
five or fewer domestic corporations?			Yes	X No	
<b>b</b> Did the transferor remain in existence after the transfer?		Х	Yes	└── No	
If not, list the controlling shareholder(s) and their identifying number(s).					
Controlling shareholder	Ide	entifying nu	ımber		
				37	
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation.	t corporation?		Yes	X No	
Name of parent corporation	EIN of	f parent co	rporati	ion	
N/A					
d Have basis adjustments under section 367(a)(4) been made?			Yes	X No	
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as	s such under sec	tion 367),			
complete questions 3a through 3d.					
a List the name and EIN of the transferor's partnership.					
Name of partnership	EI	N of partne	robin		
Name of partnership		N OI Partile	asılıp		
Oaktree Opportunties Fund XB LP	98-11878	852			
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?			Yes	□ No	
c Is the partner disposing of its entire interest in the partnership?			Yes	X No	
d Is the partner disposing of its entire interest in the partnership?  d Is the partner disposing of an interest in a limited partnership that is regularly traded on an estable			162	_21 NO	
			V	X No	
Part II Transferee Foreign Corporation Information (see instructions)		<u></u>	Yes	LAL NO	
	Fo	Idontificina		er if one	
4 Name of transferee (foreign corporation)	Ja	Identifying	numb	er, ii ariy	
Pure Data Centres Group LTD	98	816094	04		
6 Address (including country)	5b	Reference	ID num	ber	
Verde, 10 Bressenden Place					
London, SW1E 5DH United Kingdom	U-	-60.1			
7 Country code of country of incorporation or organization UK					
8 Foreign law characterization (see instructions) Corporation					
9 Is the transferee foreign corporation a controlled foreign corporation?			Yes	X No	
324531 04-01-23 LHA For Paperwork Reduction Act Notice, see separate instructions.				Rev. 11-2018	

	Regarding Tran	<b>isfer of Property</b> (see in	nstructi	ons)		
Section A - Cash		<i>a</i> .			, n	
Type of property	(a) Date of transfer	<b>(b)</b> Description of property		(c) arket value on e of transfer	(d) Cost or other basis	<b>(e)</b> Gain recognized on transfer
Cash	12/31/2023			221,589.		
10 Was cash the only pro	ainder of Part III and					X Yes No
	pperty (other tha	an intangible property	subjec	t to section 3	(d)	(0)
Type of property	Date of transfer	<b>(b)</b> Description of property		arket value on e of transfer	Cost or other basis	<b>(e)</b> Gain recognized on transfer
Stock and			<u> </u>			
securities						
Inventory			<u> </u>			
Other property (not listed under another category)						
Property with			+			
built-in loss			+			
 Totals						
<ul> <li>12 a Were any assets of a foreign corporation? If "Yes," go to line 12b b Was the transferor a dincluding a branch that if "Yes," continue to line c Immediately after the transferee foreign corporation. If "Yes," continue to line d Enter the transferred line </li> </ul>	foreign branch (included).  John Stick Corporation at is a foreign disregane 12c. If "No," skip transfer, was the dorporation?  The 12d. If "No," skip oss amount included sfer property described and questions 14a and questions 14a.		or disregal or all of the 10%-owned line 13. reholder	e assets of a foreign corpora	gn branch tion?	Yes       No         Yes       No         Yes       No         Yes       No         Yes       No
		cot to ocotion our (a)				1
Type of property	(a) Date of transfer	<b>(b)</b> Description of property	(c) Useful life	(d) Arm's length pri on date of trans		(f) Income inclusion for year of transfer
			+			+
Property described in sec. 367(d)(4)						
Totals						
Totals						

324532 04-01-23

Form	1926 (Rev. 11.2018) New Hampshire Charitable Foundation	02-6005625	Page 3
b c	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii)   \$\Bigsim \Bigsim	Yes Yes	No No No
Sup	plemental Part III Information Required To Be Reported (see instructions)		
Coi	nsideration received for non-controlling interest in Pure	e Data Cent	res
Gr	oup LTD, a UK-based corporation.		
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before $0.040\%$ (b) After $0.040\%$		
17	Type of nonrecognition transaction (see instructions) ▶ 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		77
а	J (// /		X No
b	Gain recognition under section 904(f)(5)(F)		X No
С	Recapture under section 1503(d)		X No
d	Exchange gain under section 987		X No
19	Did this transfer result from a change in entity classification?		X No
<b>20</b> a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)	Yes	X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)	<b>&gt;</b> \$	
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	☐ No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		

Yes

Return by a U.S. Transferor of Property

to a Foreign Corporation

• Go to www.irs.gov/Form926 for instructions and the latest information.

OMB	No.	1545-0026

► Attach to your income tax return for the year of the transfer or distribution.

Part I U.S. Transferor Information (see instructions)		-			
Name of transferor		Identifying number (see instructions			
New Hampshire Charitable Foundation					
		02-60056			
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation	oration?	Yes	X No		
2 If the transferor was a corporation, complete questions 2a through 2d.					
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 36	8(c)) by				
five or fewer domestic corporations?			X No		
<b>b</b> Did the transferor remain in existence after the transfer?		X Yes	└── No		
If not, list the controlling shareholder(s) and their identifying number(s).					
Controlling shareholder		Identifying number			
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent	corporation?	Yes	X No		
If not, list the name and employer identification number (EIN) of the parent corporation.	oorporation.				
Name of parent corporation	EIN	l of parent corporati	on		
N/A					
d Have basis adjustments under section 367(a)(4) been made?		Yes	X No		
		·· 00 <del>7</del> )			
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as	s such under s	section 367),			
complete questions 3a through 3d.					
a List the name and EIN of the transferor's partnership.					
Name of partnership		EIN of partnership			
Oaktree Opportunties Fund XB LP	98-118				
<b>b</b> Did the partner pick up its pro rata share of gain on the transfer of partnership assets?			└── No		
c Is the partner disposing of its entire interest in the partnership?		····· Yes	X No		
<b>d</b> Is the partner disposing of an interest in a limited partnership that is regularly traded on an estable					
securities market?		Yes	X No		
Part II Transferee Foreign Corporation Information (see instructions)	1_				
4 Name of transferee (foreign corporation)	5	a Identifying numb	er, if any		
OCM Verde XI Investments PTE LTD		98-1502538			
6 Address (including country)	5	<b>b</b> Reference ID num	ber		
9 Raffle Place, #26-01, Republic Plaza		TT CO O			
Singapore, 048619 Singapore		U-60.2			
<ul><li>7 Country code of country of incorporation or organization</li><li>SN</li></ul>					
8 Foreign law characterization (see instructions)					
Corporation		<u> </u>	<b>V</b>		
9 Is the transferee foreign corporation a controlled foreign corporation?  324531 04-01-23 LHA For Paperwork Reduction Act Notice, see separate instructions.			X No Rev. 11-2018)		
ozhou i vhtu itzu i izi i apei woin neudolion Mol Nolice, see sepai ale ilisli dollolisi		1 OHH <b>320</b> (F	10 V. 11-2010)		

	Regarding Tran	nsfer of Property (see in	nstructi	ions)		
Section A - Cash		<b>6</b> )			, s	
Type of property	(a) Date of transfer	<b>(b)</b> Description of property		(c) narket value on e of transfer	<b>(d)</b> Cost or other basis	<b>(e)</b> Gain recognized on transfer
Cash	12/31/2023			144,259.		
10 Was cash the only pro	ainder of Part III and					X Yes No
		an intangible property	subjec			(0)
Type of property	(a) Date of transfer	<b>(b)</b> Description of property		(c) narket value on e of transfer	<b>(d)</b> Cost or other basis	<b>(e)</b> Gain recognized on transfer
Stock and			<u> </u>			
securities			<del></del>			
Inventory			<del>                                     </del>			
Other property (not listed under another category)						
			+			
Property with			+			
built-in loss			+			
Totals						
12 a Were any assets of a foreign corporation?  If "Yes," go to line 12b  b Was the transferor a d (including a branch the If "Yes," continue to line c Immediately after the foreign corp If "Yes," continue to line d Enter the transferred le  13 Did the transferor tran If "No," skip Section Company of the stransferor tran If "No," skip Section Company of the stransferor tran If "No," skip Section Company of the stransferor tran If "No," skip Section Company of the stransferor tran If "No," skip Section Company of the stransferor tran If "No," skip Section Company of the stransferor tran If "No," skip Section Company of the stransferor tran If "No," skip Section Company of the stransferor tran If "No," skip Section Company of the stransferor transferor transfero	foreign branch (included).  John Stick Corporation at is a foreign disregane 12c. If "No," skip transfer, was the dorporation?  The 12d. If "No," skip oss amount included sfer property described and questions 14a and questions 14a.	_	all of the 9%-owned line 13. reholder under se	rded entity) trans e assets of a fore d foreign corpora with respect to the	ign branch tion?	Yes
Section C - Intangible	Property Subje	ect to Section 367(d)				
Type of property	(a) Date of transfer	<b>(b)</b> Description of property	(c) Useful life	(d) Arm's length pri on date of trans		(f) Income inclusion for year of transfer
			+			+
			+			+
Property described in sec. 367(d)(4)						
Totals						+
Τοταίο					F	Form <b>926</b> (Rev. 11-2018)

time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Form	926 (Rev. 11-2018) New Hampshire Charitable Foundation	02-6005625	Page <b>3</b>
b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?	14 a	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life		
c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section  1.367(d)-1(c)(3)(i) for any intangible property?  d If the answer to line 14 c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ▶ \$  15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?		reasonably anticipated to exceed 20 years?	Yes	Щ No
1.367(d)-1(c)(3)(ii) for any intangible property?	b	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?	Yes	☐ No
d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ▶ \$  Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	С	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section		
to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-f(c)(3)(ii)    Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?    Yes    No  Supplemental Part III Information Required To Be Reported (see instructions)  Consideration received for non-controlling interest in OCM Verde XI  Investments PTE LTD, a Singapore-based corporation.  Part IV Additional Information Regarding Transfer of Property (see instructions)  16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before 0.038 % (b) After 0.038 %  17 Type of nonrecognition transaction (see instructions)   351  18 Indicate whether any transfer reported in Part III is subject to any of the following.  a Gain recognition under section 904(f)(3)    b Gain recognition under section 904(f)(5)(F)    c Recapture under section 987    b Gain recognition under section 987    d Exchange gain under section 987    D Id a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)    Yes X No If 'Yes,' complete lines 20b and 20c.		1.367(d)-1(c)(3)(ii) for any intangible property?	Yes	☐ No
Regulations section 1.367(d)·1(c)(3)(ii) ▶ \$  Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482·7(c)(1)?	d	If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable		
Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?    Yes		to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in		
time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?		Regulations section 1.367(d)-1(c)(3)(ii) ▶\$		
Supplemental Part III Information Required To Be Reported (see instructions)  Consideration received for non-controlling interest in OCM Verde XI  Investments PTE LTD, a Singapore-based corporation.  Part IV Additional Information Regarding Transfer of Property (see instructions)  16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before 0.038 % (b) After 0.038 %  17 Type of nonrecognition transaction (see instructions) ▶ 351  18 Indicate whether any transfer reported in Part III is subject to any of the following.  a Gain recognition under section 904(f)(3).	15	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any		
Part IV   Additional Information Regarding Transfer of Property (see instructions)    Consideration received for non-controlling interest in OCM Verde XI		time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Yes	☐ No
Part IV   Additional Information Regarding Transfer of Property (see instructions)    Consideration received for non-controlling interest in OCM Verde XI	Sup	plemental Part III Information Required To Be Reported (see instructions)		
Part IV   Additional Information Regarding Transfer of Property (see instructions)  16			Verde XI	
Part IV   Additional Information Regarding Transfer of Property (see instructions)  16				
16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before 0.038 % (b) After 0.038 %  17 Type of nonrecognition transaction (see instructions) ▶ 351  18 Indicate whether any transfer reported in Part III is subject to any of the following.  a Gain recognition under section 904(f)(3)		, 5 1		
16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before 0.038 % (b) After 0.038 %  17 Type of nonrecognition transaction (see instructions) ▶ 351  18 Indicate whether any transfer reported in Part III is subject to any of the following.  a Gain recognition under section 904(f)(3)				
16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before 0.038 % (b) After 0.038 %  17 Type of nonrecognition transaction (see instructions) ▶ 351  18 Indicate whether any transfer reported in Part III is subject to any of the following.  a Gain recognition under section 904(f)(3)				
16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before 0.038 % (b) After 0.038 %  17 Type of nonrecognition transaction (see instructions) ▶ 351  18 Indicate whether any transfer reported in Part III is subject to any of the following.  a Gain recognition under section 904(f)(3)				
16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before 0.038 % (b) After 0.038 %  17 Type of nonrecognition transaction (see instructions) ▶ 351  18 Indicate whether any transfer reported in Part III is subject to any of the following.  a Gain recognition under section 904(f)(3)				
16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before 0.038 % (b) After 0.038 %  17 Type of nonrecognition transaction (see instructions) ▶ 351  18 Indicate whether any transfer reported in Part III is subject to any of the following.  a Gain recognition under section 904(f)(3)				
16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before 0.038 % (b) After 0.038 %  17 Type of nonrecognition transaction (see instructions) ▶ 351  18 Indicate whether any transfer reported in Part III is subject to any of the following.  a Gain recognition under section 904(f)(3)				
16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before 0.038 % (b) After 0.038 %  17 Type of nonrecognition transaction (see instructions) ▶ 351  18 Indicate whether any transfer reported in Part III is subject to any of the following.  a Gain recognition under section 904(f)(3)				
16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before	Pai	rt IV Additional Information Regarding Transfer of Property (see instructions)		
(a) Before 0.038 % (b) After 0.038 %  Type of nonrecognition transaction (see instructions) ▶ 351  Indicate whether any transfer reported in Part III is subject to any of the following.  a Gain recognition under section 904(f)(3)		reaction at the garanty frame of the policy (edge interested)		
(a) Before 0.038 % (b) After 0.038 %  Type of nonrecognition transaction (see instructions) ▶ 351  Indicate whether any transfer reported in Part III is subject to any of the following.  a Gain recognition under section 904(f)(3)	16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
Type of nonrecognition transaction (see instructions) ▶ 351  Indicate whether any transfer reported in Part III is subject to any of the following.  a Gain recognition under section 904(f)(3)				
Indicate whether any transfer reported in Part III is subject to any of the following.  a Gain recognition under section 904(f)(3)  b Gain recognition under section 904(f)(5)(F)  c Recapture under section 1503(d)  d Exchange gain under section 987  Did this transfer result from a change in entity classification?  20 a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)  Yes X No	17			
a Gain recognition under section 904(f)(3)  b Gain recognition under section 904(f)(5)(F)  c Recapture under section 1503(d)  d Exchange gain under section 987  19 Did this transfer result from a change in entity classification?  20 a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)  Yes  X No	18			
b Gain recognition under section 904(f)(5)(F)  c Recapture under section 1503(d)  d Exchange gain under section 987  19 Did this transfer result from a change in entity classification?  20 a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)  Yes  X No			Yes	X No
c Recapture under section 1503(d) d Exchange gain under section 987  19 Did this transfer result from a change in entity classification?  20 a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)  Yes X No  X No  Yes X No  Yes X No  If "Yes," complete lines 20b and 20c.				
d Exchange gain under section 987  19 Did this transfer result from a change in entity classification?  20 a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)  Yes  X No  Yes  X No  Yes  X No  Yes  No  If "Yes," complete lines 20b and 20c.		Recapture under section 1503(d)		
19 Did this transfer result from a change in entity classification?  20 a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)  Yes  X No  Yes  X No  If "Yes," complete lines 20b and 20c.				
20 a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)  Yes  X No If "Yes," complete lines 20b and 20c.				
If "Yes," complete lines 20b and 20c.			······	
, 1	u			110
b Enter the total amount of gain of loss recognized pursuant to negulations section 1.507 (e)-2(b)	h	, 1	<b>\$</b>	
c Did the domestic corporation not recognize gain or loss on the distribution of property because the			▶ Ψ	
property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	C		Voc	No.
	21			110

Yes

### Form **926**(Rev. November 2018) Department of the Treasury Internal Revenue Service

### Return by a U.S. Transferor of Property to a Foreign Corporation

to a Foreign Corporation

▶ Go to www.irs.gov/Form926 for instructions and the latest information.

▶ Attach to your income tax return for the year of the transfer or distribution.

OMB No. 1545-0026

Part 1 0.5. Transferor information (see instructions)					
Name of transferor		Identifying number (see instructions)			
New Hampshire Charitable Foundation					
		02-6	5005	625	
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation	ration?		Yes	X No	
2 If the transferor was a corporation, complete questions 2a through 2d.					
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 36	8(c)) by				
five or fewer domestic corporations?			Yes	X No	
b Did the transferor remain in existence after the transfer?			Yes	□ No	
If not, list the controlling shareholder(s) and their identifying number(s).			163	140	
Controlling shareholder		Identifying n	umber		
e If the transferor was a member of an efficiency aroun filling a second dated water was the first and a second dated water and the second dated water and the second dated water and the second dated and the second dated are the second dated and the second dated	oornousties (	,	Ves	X No	
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation.	corporation:	·	Yes	NO	
Name of parent corporation	EII	N of parent c	orporati	ion	
N/A					
207(1/1)			Var	X No	
d Have basis adjustments under section 367(a)(4) been made?			Yes	L41 NO	
2 If the transferor was a partner in a pertnership that was the setual transferor (hut is not time to be	a cuch unda-	coction 267\			
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as	s such under	section 367),			
complete questions 3a through 3d.					
a List the name and EIN of the transferor's partnership.					
Name of partnership		EIN of partn	ership		
Highland Europe Technology Growth V LP	98-165	9261			
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?			Yes	□ No	
c Is the partner disposing of its entire interest in the partnership?			Yes	X No	
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an estable				110	
			Yes	X No	
Part II Transferee Foreign Corporation Information (see instructions)			169	INU	
Name of transferee (foreign corporation)		5a Identifyin	a numh	er. if any	
3. nan.a.a.a. (.a.a.g., aa.pananan)	[		٠.٠٠١١١٥	_, u.,	
Pvcase UAB					
6 Address (including country)	1	<b>5b</b> Reference	ID num	ber	
Karaliaus Mindaugo PR 38					
Kaunas, 44307 Lithuania		U-48.1			
7 Country code of country of incorporation or organization	L				
LH					
8 Foreign law characterization (see instructions)					
Corporation					
9 Is the transferee foreign corporation a controlled foreign corporation?			Yes	X No	
201501 01 01 02 LUA For Penerwork Peduction Act Notice and congrete instructions		Гог	00e /I	Dov. 11.2010\	

	Regarding Tran	<b>sfer of Property</b> (see i	nstructi	ions)		
Section A - Cash						
Type of	(a) Date of	<b>(b)</b> Description of	Fair m	(c) narket value on	(d) Cost or other	<b>(e)</b> Gain recognized on
property	transfer	property		e of transfer	basis	transfer
Cash	12/31/2023			143,270.		
10 Was cash the only pro	ainder of Part III and g					X Yes No
Section B - Other Pro			subjec			()
Type of property	(a) Date of transfer	<b>(b)</b> Description of property		(c) narket value on e of transfer	(d) Cost or other basis	<b>(e)</b> Gain recognized on transfer
Stock and securities						
Inventory						
Other property						
(not listed under						
another category)						
Property with						
built-in loss						
Totals						
12 a Were any assets of a foreign corporation?  If "Yes," go to line 12th  b Was the transferor a continue to limit of the transferee foreign corporation of the transferee foreign corporation of the transferee of the transferred of the trans	foreign branch (included)  domestic corporation at is a foreign disregate 12c. If "No," skip I transfer, was the don poration?  ne 12d. If "No," skip I oss amount included asfer property describ and questions 14a to	that transferred substantiall urded entity) to a specified 1 ines 12c and 12d, and go to nestic corporation a U.S. shadine 12d, and go to line 13. in gross income as required ed in section 367(d)(4)?	y all of the 0%-owne o line 13. areholder	rded entity) transferments	n branch	Yes No Yes No Yes No Yes No
Section C - Intangible	e Property Subje	ect to Section 367(a)	_	•		1
Type of property	(a) Date of transfer	<b>(b)</b> Description of property	(c) Useful life	(d) Arm's length price on date of transfe		(f) Income inclusion for year of transfer
			+	1		+
			_			
Dona a substanta a substant			_			
Property described			-			
in sec. 367(d)(4)			+			
			+			
			+	1		
			+			
Totals						
Totals				I	F	

Forn	n 926 (Rev. 11.2018) New Hampshire Charitable Foundation	02-6005625	Page 3
14 a	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?	Yes	□ No
b	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?		☐ No
	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section		
	1.367(d)-1(c)(3)(ii) for any intangible property?	Yes	☐ No
d	If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable		
	to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in		
	Regulations section 1.367(d)-1(c)(3)(ii) ▶\$		
15	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any		
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Yes	☐ No
<u> </u>	oplemental Part III Information Required To Be Reported (see instructions)		
Co	nsideration received for non-controlling interest in Pvc	ase UAB, a	
	thuania-based corporation.	,	
==	<u></u>		
Pa	art IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before $0.000\%$ (b) After $0.030\%$		
17	Type of nonrecognition transaction (see instructions) ▶ 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
а	Gain recognition under section 904(f)(3)	Yes	X No
b			X No
С			X No
d	Exchange gain under section 987		X No
19	Did this transfer result from a change in entity classification?		X No
	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)		X No
	If "Yes," complete lines 20b and 20c.	<u> </u>	
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)	<b>&gt;</b> \$	
	Did the domestic corporation not recognize gain or loss on the distribution of property because the	<i>F</i> *	
Ŭ			
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	☐ No

Yes

Return by a U.S. Transferor of Property

to a Foreign Corporation

▶ Go to www.irs.gov/Form926 for instructions and the latest information. ▶ Attach to your income tax return for the year of the transfer or distribution.

OMB	No.	1545-0026

Part I U.S. Transferor Information (see instructions)					
Name of transferor					
New Hampshire Charitable Foundation		02-6	5005	625	
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corp	oration?		Yes	X No	
2 If the transferor was a corporation, complete questions 2a through 2d.					
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 3	368(c)) by				
five or fewer domestic corporations?			Yes	X No	
<b>b</b> Did the transferor remain in existence after the transfer?		X	Yes	☐ No	
If not, list the controlling shareholder(s) and their identifying number(s).					
Controlling shareholder	ı	dentifying n	umber		
c If the transferor was a member of an affiliated group filing a consolidated return, was it the pare If not, list the name and employer identification number (EIN) of the parent corporation.	nt corporation?		Yes	X No	
Name of parent corporation	EIN	of parent co	rporati	ion	
N/A					
d Have basis adjustments under section 367(a)(4) been made?			Yes	X No	
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated	as such under s	ection 367),			
complete questions 3a through 3d.					
a List the name and EIN of the transferor's partnership.					
Name of partnership	1	EIN of partn	ership		
Traine of partitioning		o. pa	o. op		
Highland Europe Technology Growth V LP	98-1659	0261			
			Yes	No.	
<ul><li>b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?</li><li>c Is the partner disposing of its entire interest in the partnership?</li></ul>			Yes	∟ No Х No	
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an esta			162	_ <u></u>	
			Yes	X No	
Part II Transferee Foreign Corporation Information (see instructions)			163	LII NO	
4 Name of transferee (foreign corporation)	5:	a Identifyin	a numb	er. if any	
ranco di dano de Cosagni de Peranco,			j	,,	
Oritain Global LTD					
6 Address (including country)	51	<b>b</b> Reference	ID num	nber	
167 High Street					
Dunedin, 9016 New Zealand	τ	U-48.2			
7 Country code of country of incorporation or organization					
NZ					
8 Foreign law characterization (see instructions)					
Corporation				<b>V</b>	
9 Is the transferee foreign corporation a controlled foreign corporation?		<u> </u>	Yes	X No	
324531 04-01-23 LHA For Paperwork Reduction Act Notice, see separate instructions.		Fori	11 926 (I	Rev. 11-2018)	

	Regarding Tran	sfer of Property (see	nstructi	ions)		
Section A - Cash					( 0	
Type of property	(a) Date of transfer	<b>(b)</b> Description of property		(c) narket value on e of transfer	<b>(d)</b> Cost or other basis	<b>(e)</b> Gain recognized on transfer
Cash	12/31/2023			142,407.		
10 Was cash the only pro	ainder of Part III and					X Yes No
Section B - Other Pro	pperty (other that (a)		subjec	(c)	(d)	(0)
Type of property	Date of transfer	<b>(b)</b> Description of property		narket value on e of transfer	Cost or other basis	<b>(e)</b> Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
			-			
Totals						
recognition agreement  12 a Were any assets of a foreign corporation?  If "Yes," go to line 12b  b Was the transferor a d  (including a branch the  If "Yes," continue to lin  c Immediately after the foreign corp  If "Yes," continue to lin  d Enter the transferred line	t was filed?  foreign branch (included)  lomestic corporation at is a foreign disregation at 12c. If "No," skip transfer, was the doreoration?  me 12d. If "No," skip oss amount included sfer property describ and questions 14a.	that transferred substantiall arded entity) to a specified 1 lines 12c and 12d, and go to mestic corporation a U.S. shalline 12d, and go to line 13. It in gross income as required and in section 367(d)(4)?	ly all of the 0%-owned o line 13. areholder	rded entity) trans e assets of a forei d foreign corpora with respect to th	ferred to a  gn branch tion?	Yes         No           Yes         No           Yes         No           Yes         No           Yes         No
Type of property	(a) Date of transfer	(b)  Description of property	(c) Useful life	(d) Arm's length pri on date of trans		(f) Income inclusion for year of transfer
Property described in sec. 367(d)(4)						
Totals						
					F	Form <b>926</b> (Rev. 11-2018)

Form	1926 (Rev. 11-2018) New Hampshire Charitable Foundation	02-	6005625	Page <b>3</b>
b c	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii)   \$\Bigsim \Bigsim		Yes Yes Yes	No No No
Sup	pplemental Part III Information Required To Be Reported (see instructions)			
Coi	nsideration received for non-controlling interest in Ori	tain	Global	LTD,
a 1	New Zealand-based corporation.			
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)			
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before $0.000\%$ (b) After $0.040\%$			
17	Type of nonrecognition transaction (see instructions) ► 351			
18	Indicate whether any transfer reported in Part III is subject to any of the following.			
а	· · · · · · · · · · · · · · · · · · ·		Yes	X No
b	J (7, 7, 7,		Yes	X No
С	Recapture under section 1503(d)		Yes	X No
d	Exchange gain under section 987		Yes	X No
19	Did this transfer result from a change in entity classification?		Yes	X No
<b>20</b> a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)		Yes	X No
	If "Yes," complete lines 20b and 20c.			
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)		\$	
С				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes	☐ No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			

Yes

Return by a U.S. Transferor of Property

to a Foreign Corporation

▶ Go to www.irs.gov/Form926 for instructions and the latest information.

Attachment	
Attachment	128
Sequence No.	1/0

Department of the Treasury Internal Revenue Service Attach to your income tax return for the year of the transfer or distribution.

OMB No. 1545-0026

Name of transferor		Identifying number (See	instructions)		
New Hampshire Charitable Foundation	1.20mm]   1.20mm]   (266	(see instructions)			
		02-6005625			
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corpo	ration?	Yes 2	No		
2 If the transferor was a corporation, complete questions 2a through 2d.					
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 36		Yes 2	Nο		
<b>b</b> Did the transferor remain in existence after the transfer?		X Yes	_ No		
Controlling shareholder		Identifying number			
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent	acrocation	? Yes 2	∑ No		
If not, list the name and employer identification number (EIN) of the parent corporation.	Corporation	: 1es	<u>-</u> 140		
Name of parent corporation	EI	N of parent corporation			
N/A					
d Have basis adjustments under section 367(a)(4) been made?		Yes Z	∑ No		
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as	s such under	section 367),			
complete questions 3a through 3d.					
a List the name and EIN of the transferor's partnership.					
Name of partnership		EIN of partnership			
Firstmark Capital V LP	84-37				
<b>b</b> Did the partner pick up its pro rata share of gain on the transfer of partnership assets?		X Yes	⊒ No		
c Is the partner disposing of its entire interest in the partnership?		Yes	Nο		
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an establ	ished		∑ No		
Part II Transferee Foreign Corporation Information (see instructions)		Yes	<u>z</u> No		
Name of transferee (foreign corporation)		5a Identifying number, it	any		
			,		
Sparta Commodities SA		Fh. Deference ID accorden			
6 Address (including country) 77 Rue De Lyon		<b>5b</b> Reference ID number			
Geneva, 1203 Switzerland		U-40			
7 Country code of country of incorporation or organization SZ					
8 Foreign law characterization (see instructions)					
Corporation					
9 Is the transferee foreign corporation a controlled foreign corporation?		Yes 2	∑ No		

	Regarding Tran	<b>sfer of Property</b> (see i	nstructi	ions)		
Section A - Cash						
Type of	(a) Date of	<b>(b)</b> Description of	Fair m	(c) narket value on	(d) Cost or other	<b>(e)</b> Gain recognized on
property	transfer	property	dat	e of transfer	basis	tranšfer
Cash	08/18/2023			110,526.		
10 Was cash the only pro		jo to Part IV.				X Yes No
Section B - Other Pro	perty (other tha	n intangible property	subjec	t to section 36		
Type of property	(a) Date of transfer	<b>(b)</b> Description of property		(c) narket value on e of transfer	(d) Cost or other basis	<b>(e)</b> Gain recognized on transfer
Stock and securities						
Inventory						
,						
Other property						
(not listed under						
another category)						
Property with						
built-in loss						
			_			
Totals						
<ul> <li>12 a Were any assets of a foreign corporation? If "Yes," go to line 12th b Was the transferor a complete (including a branch the lif "Yes," continue to limit of transferee foreign cormulates," continue to limit of the transferee foreign cormulates, continue to limit of the transferree </li> </ul>	foreign branch (included)  domestic corporation last is a foreign disregation and 12c. If "No," skip list transfer, was the dome poration?  ne 12d. If "No," skip list included and and questions 14a to 14 to 15 to 16	that transferred substantiall urded entity) to a specified 1 ines 12c and 12d, and go to nestic corporation a U.S. shadine 12d, and go to line 13. in gross income as required ed in section 367(d)(4)?	y all of the 0%-owne o line 13. areholder	rded entity) transfer e assets of a foreigr d foreign corporatio with respect to the	branch	Yes       No         Yes       No         Yes       No         Yes       No
Section C - intangible	e Property Subje	ect to section sor(a)	1	ı	1	
Type of property	<b>(a)</b> Date of transfer	<b>(b)</b> Description of property	(c) Useful life	(d) Arm's length price on date of transfer		(f) Income inclusion for year of transfer
Property described			_			+
in sec. 367(d)(4)			+			+
			+			+
			+			
			+	1		1
 Totals						1
างเผง				1	F	orm <b>926</b> (Rev. 11-2018)

Form	1926 (Rev. 11-2018) New Hampshire Charitable Foundation	02-	-6005625	Page <b>3</b>
b c	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii)   \$\Bigsim \Bigsim		Yes Yes Yes	No No No
Sup	oplemental Part III Information Required To Be Reported (see instructions)			
	nsideration received for non-controlling interest in Span	rta	Commodi	ties
SA	, a Switzerland-based corporation.			
_				
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)			
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before $0.000\%$ (b) After $0.110\%$			
17	Type of nonrecognition transaction (see instructions) ► 351			
18	Indicate whether any transfer reported in Part III is subject to any of the following.			
а	Gain recognition under section 904(f)(3)		Yes	X No
b	Gain recognition under section 904(f)(5)(F)		Yes	X No
С			Yes	X No
d	Exchange gain under section 987		Yes	X No
19	Did this transfer result from a change in entity classification?		Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)		Yes	X No
	If "Yes," complete lines 20b and 20c.			
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)	▶	· \$	
С				
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		Yes	☐ No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			

Yes

### Return by a U.S. Transferor of Property

to a Foreign Corporation

• Go to www.irs.gov/Form926 for instructions and the latest information. ► Attach to your income tax return for the year of the transfer or distribution.

OMB No. 15	545-0026
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Part I U.S. Transferor Information (see instructions)				
Name of transferor	Identifyi	ng numbe	er (see instructions)	
New Hampshire Charitable Foundation				
		02-6	50056	
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation	ation?		Yes	X No
2 If the transferor was a corporation, complete questions 2a through 2d.				
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368	(c)) by			
five or fewer domestic corporations?			Yes	X No
<b>b</b> Did the transferor remain in existence after the transfer?		X	Yes	└── No
If not, list the controlling shareholder(s) and their identifying number(s).				
Controlling shareholder		Identifying n	umber	
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent of	corporation?		Yes	X No
If not, list the name and employer identification number (EIN) of the parent corporation.	corporation:		163	NO
Name of parent corporation	EIN	l of parent co	ornorati	
Name of parent corporation	Liiv	or parent of	лрогац	OII
NT / 7				
N/A				X No
d Have basis adjustments under section 367(a)(4) been made?			Yes	L <b>∆</b> No
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as	auch under e	naction 267)		
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as complete questions 3a through 3d.	such under s	section 307),		
a List the name and EIN of the transferor's partnership.				
a List the name and Lint of the transferor a partnership.				
Name of partnership		EIN of partn	ership	
EIF V, LP	92 - 049	1648		
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?		X	Yes	No
c Is the partner disposing of its entire interest in the partnership?			Yes	X No
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an establis				
securities market?			Yes	X No
Part II Transferee Foreign Corporation Information (see instructions)				
4 Name of transferee (foreign corporation)	5	a Identifyin	g numb	<b>er</b> , if any
D 1 17 / TED				
Revalue Nature LTD				
6 Address (including country)	5	<b>b</b> Reference	ID num	ber
86-90 Paul Street		TT 20		
London, EC2A 4NE United Kingdom		U-30		
7 Country code of country of incorporation or organization UK				
8 Foreign law characterization (see instructions)				
Corporation				
9 Is the transferee foreign corporation a controlled foreign corporation?			Yes	X No
324531 04-01-23 LHA For Paperwork Reduction Act Notice, see separate instructions.		For	m <b>926</b> (F	Rev. 11-2018)

Part III Information Section A - Cash	Regarding Trans	sfer of Property (see	instructi	ons)		· age =
Type of property	(a) Date of transfer	<b>(b)</b> Description of property		(c) arket value on e of transfer	(d) Cost or other basis	<b>(e)</b> Gain recognized on transfer
Cash	12/31/2023			158,039.		
If "Yes," skip the rema	ainder of Part III and g					X Yes No
Section B - Other Pro	pperty (other tha (a) Date of transfer	n intangible property (b)  Description of property	Fair m	t to section 3 (c) arket value on e of transfer	(d) Cost or other basis	<b>(e)</b> Gain recognized on transfer
Stock and		,				
securities						
Inventory						
Other property (not listed under another category)						
Property with						
built-in loss						
Totals						
<ul> <li>12 a Were any assets of a foreign corporation?</li> <li>If "Yes," go to line 12th</li> <li>b Was the transferor a confined including a branch the second of the s</li></ul>	foreign branch (included)  domestic corporation at is a foreign disregate transfer, was the domporation?  ne 12d. If "No," skip lites amount included asfer property describ and questions 14a to	that transferred substantial rded entity) to a specified 1 nes 12c and 12d, and go to lestic corporation a U.S. shall in gross income as required ed in section 367(d)(4)?	ly all of the 0%-owned o line 13. areholder	e assets of a fore d foreign corpora	ferred to a	Yes       No         Yes       No         Yes       No         Yes       No         Yes       No
						1
Type of property	(a) Date of transfer	<b>(b)</b> Description of property	(c) Useful life	(d) Arm's length pri on date of trans		Income inclusion for year of transfer
			+		+	+
Property described						
in sec. 367(d)(4)						
						+
Totals						
	<u> </u>				F	orm <b>926</b> (Rev. 11-2018)

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b c	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii)   \$\Bigsim \Bigsim	Yes	No No No No
Sup	oplemental Part III Information Required To Be Reported (see instructions)		
Coi	nsideration received for non-controlling interest in Reva	alue Nature	LTD,
a t	JK-based corporation.		
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before $0.000\%$ (b) After $0.580\%$		
17	Type of nonrecognition transaction (see instructions) ▶ 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
а	Gain recognition under section 904(f)(3)	Yes	X No
b	Gain recognition under section 904(f)(5)(F)		X No
С	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987		X No
19	Did this transfer result from a change in entity classification?		X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)		X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)	▶ \$	
	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	☐ No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		

Yes

Return by a U.S. Transferor of Property

to a Foreign Corporation

• Go to www.irs.gov/Form926 for instructions and the latest information. ► Attach to your income tax return for the year of the transfer or distribution. OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)	
Name of transferor	Identifying number (see instructions)
New Hampshire Charitable Foundation	
	02-6005625
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation	tion? Yes X No
2 If the transferor was a corporation, complete questions 2a through 2d.	
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c	
five or fewer domestic corporations?	Yes X No
<b>b</b> Did the transferor remain in existence after the transfer?	X Yes No
If not, list the controlling shareholder(s) and their identifying number(s).	
Controlling shareholder	Identifying number
	[ <del>-</del>
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent co	orporation? Yes X No
If not, list the name and employer identification number (EIN) of the parent corporation.	
Name of parent corporation	EIN of parent corporation
N/A	
d Have basis adjustments under section 367(a)(4) been made?	Yes X No
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as s	uch under section 367),
complete questions 3a through 3d.	
a List the name and EIN of the transferor's partnership.	
Name of partnership	EIN of partnership
	o. pp
N/A	
· · ·	Van Na
<b>b</b> Did the partner pick up its pro rata share of gain on the transfer of partnership assets?	
<ul><li>c Is the partner disposing of its entire interest in the partnership?</li><li>d Is the partner disposing of an interest in a limited partnership that is regularly traded on an establish</li></ul>	
securities market?	
Part II Transferee Foreign Corporation Information (see instructions)	
4 Name of transferee (foreign corporation)	5a Identifying number, if any
Dover Street X Cayman Fund LP	
6 Address (including country)	5b Reference ID number
One Financial Center, 44th Floor	
Boston, MA 02111	926-9
7 Country code of country of incorporation or organization	
Cayman Islands	
8 Foreign law characterization (see instructions)	
Limited Partnership	<sub></sub>   <del>U</del>
9 Is the transferee foreign corporation a controlled foreign corporation?	
324531 04-01-23 LHA For Paperwork Reduction Act Notice, see separate instructions.	Form <b>926</b> (Rev. 11-2018)

Part III Information Section A - Cash	Regarding Tran	sfer of Property (see i	nstructi	ions)		
Type of property	(a) Date of transfer	<b>(b)</b> Description of property		(c) narket value on e of transfer	(d) Cost or other basis	<b>(e)</b> Gain recognized on transfer
Cash	12/31/2023			362,500.		
10 Was cash the only pro- If "Yes," skip the rema		go to Part IV.			Γ	X Yes No
Section B - Other Pro	<del>.                                      </del>	<u> </u>	subjec		` ''	
Type of property	(a) Date of transfer	<b>(b)</b> Description of property		(c) narket value on e of transfer	(d) Cost or other basis	<b>(e)</b> Gain recognized on transfer
Stock and securities						
Inventory						
involucity						
Other property						
(not listed under another category)						
another category)						
Property with						
built-in loss						
Totals						
12 a Were any assets of a foreign corporation?  If "Yes," go to line 12b  b Was the transferor a continue to line 12b  c Immediately after the transferee foreign corporation in the transferee foreign corporate in the transferee of the transferee of the transferee of the transferred of the transfer	foreign branch (included)  domestic corporation at is a foreign disregate 12c. If "No," skip transfer, was the dorporation?  ne 12d. If "No," skip oss amount included asfer property describe and questions 14a for the standard serious serious 14a for the standard serious 14a fo	that transferred substantiall arded entity) to a specified 1 lines 12c and 12d, and go to nestic corporation a U.S. shalline 12d, and go to line 13. In gross income as required and in section 367(d)(4)?	y all of the 0%-owne line 13. areholder	e assets of a foreid foreign corpora with respect to the	gn branch tion?	Yes No Yes No Yes No Yes No
Section C - Intangible	e Property Subje	ect to Section 367(d)		1	1	<u> </u>
Type of property	(a) Date of transfer	<b>(b)</b> Description of property	(c) Useful life	(d) Arm's length pri on date of trans		(f) Income inclusion for year of transfer
Property described in sec. 367(d)(4)						
Totals						
					F	orm <b>926</b> (Rev. 11-2018)

Form	1926 (Rev. 11-2018) New Hampshire Charitable Foundation	02-6005625	Page 3
b	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?	Yes	No No No
d	If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) \$\infty\$\$\\$\		
15	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Yes	☐ No
	plemental Part III Information Required To Be Reported (see instructions)		
	nsideration received for non-controlling interest in Dov	er Street X	
Cay	yman Fund, a Cayman Island-based company.		
Do	rt IV Additional Information Regarding Transfer of Property (see instructions)		
Га	Additional information negarding transfer of Property (see instructions)		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before $0.001\%$ (b) After $0.001\%$		
17	Type of nonrecognition transaction (see instructions) ▶ 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
а	Gain recognition under section 904(f)(3)		X No
b	Gain recognition under section 904(f)(5)(F)		X No
С	Recapture under section 1503(d)		X No
d	Exchange gain under section 987	······	X No
19	Did this transfer result from a change in entity classification?		X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)	Yes	X No
	If "Yes," complete lines 20b and 20c.		
	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)	<b>&gt;</b> \$	
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	└── No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		

Yes

### (Rev. November 2018)

Return by a U.S. Transferor of Property

to a Foreign Corporation

▶ Go to www.irs.gov/Form926 for instructions and the latest information.

Attachment Seguence No	4	2	0
Sequence No.	1	2	ö

OMB No. 1545-0026

Department of the Treasury Internal Revenue Service ► Attach to your income tax return for the year of the transfer or distribution. Part I U.S. Transferor Information (see instructions)

Name of transferor	Identifying number (see instructions)
New Hampshire Charitable Foundation	(see instructions)
Now namponize onarroadic roundation	02-6005625
Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?	
2 If the transferor was a corporation, complete questions 2a through 2d.	
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by	
five or fewer domestic corporations?	Yes X No
b Did the transferor remain in existence after the transfer?	
If not, list the controlling shareholder(s) and their identifying number(s).	
Controlling shareholder	Identifying number
	T7
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporati	ion? Yes X No
If not, list the name and employer identification number (EIN) of the parent corporation.	
Name of parent corporation	EIN of parent corporation
N/A	
d Have basis adjustments under section 367(a)(4) been made?	Yes X No
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such unc	der section 367),
complete questions 3a through 3d.	
a List the name and EIN of the transferor's partnership.	
Name of partnership	EIN of partnership
N/A	
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?	Yes No
c Is the partner disposing of its <b>entire</b> interest in the partnership?	
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established	
securities market?	Yes No
Part II Transferee Foreign Corporation Information (see instructions)	
4 Name of transferee (foreign corporation)	5a Identifying number, if any
Markovia Clabal Engineerat Engite Engl (Common) IED	
Mackenzie Global Environment Equity Fund (Cayman) LTD	El. Defense et ID musels en
6 Address (including country) Ugland House, South Church Street	5b Reference ID number
Grand Cayman, Cayman Islands KY1-1104 Cayman Islands	926-20
7 Country code of country of incorporation or organization	1 320 20
CJ	
8 Foreign law characterization (see instructions)	
Cayman Islands Exempted Company	
9 Is the transferee foreign corporation a controlled foreign corporation?	Yes X No
324531 04-01-23 LHA For Paperwork Reduction Act Notice, see separate instructions.	Form 926 (Rev. 11-2018)

	Regarding Tran	<b>sfer of Property</b> (see i	nstructi	ions)		
Section A - Cash						
Type of	(a) Date of	<b>(b)</b> Description of	Fair m	(c) narket value on	(d) Cost or other	<b>(e)</b> Gain recognized on
property	transfer	property	dat	e of transfer	basis	transfer
Cash	12/31/2023		1,	500,000.		
10 Was cash the only pro If "Yes," skip the rema		go to Part IV.				X Yes No
Section B - Other Pro			subjec			
Type of property	<b>(a)</b> Date of transfer	<b>(b)</b> Description of property		(c) narket value on e of transfer	(d) Cost or other basis	<b>(e)</b> Gain recognized on transfer
Stock and securities			+			
Inventory						
,						
Other property						
(not listed under						
another category)						
Property with						
built-in loss						
			_			
Totals						
recognition agreement was filed?  12 a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  If "Yes," go to line 12b.  b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation?  If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.  c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?  If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.  d Enter the transferred loss amount included in gross income as required under section 91  S No  If "No," skip Section C and questions 14a through 15.						
Section C - Intangible	e Property Subje	ect to Section 367(a)	_	1		
Type of property	(a) Date of transfer	<b>(b)</b> Description of property	(c) Useful life	(d) Arm's length price on date of transfer		(f) Income inclusion for year of transfer
			+			1
			_			
Droporty doposihod						
Property described in sec. 367(d)(4)						
III Sec. 307 (a)(4)						
			+	1		1
			+			+
Totals						
				1	F	form <b>926</b> (Rev. 11-2018)

Form	926 (Rev. 11-2018) New Hampshire Charitable Foundation	02-6005625	Page 3
14 a	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?	Yes	□ No
b	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?		□ No
	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section		
·	1.367(d)-1(c)(3)(ii) for any intangible property?	Yes	☐ No
d	If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable		
	to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in		
	Regulations section 1.367(d)-1(c)(3)(ii) ▶\$		
15	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any		
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Yes	☐ No
Sup	plemental Part III Information Required To Be Reported (see instructions)		
Coi	nsideration received for non-controlling interest in Mac	kenzie Globa	a1
Env	$v$ ironment Equity Fund (Cayman) LTD, a Cayman Island-base $\epsilon$	d company.	
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  (a) Before		
17	Type of nonrecognition transaction (see instructions) ▶ 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
а	Gain recognition under section 904(f)(3)		X No
b	Gain recognition under section 904(f)(5)(F)	· · · · · · · · · · · · · · · · · · ·	X No
С	Recapture under section 1503(d)		X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)	Yes	X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)	<b>&gt;</b> \$_	
	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	☐ No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		

Yes