Form 990-T

Exempt Organization Business Income Tax Return
(And proxy tax under section 6033(e))

For calendar year 2019 or other tax year beginning , and ending .

U. 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

Print

THE SAINT PAUL FOUNDATION

101 FIFTH STREET EAST, SUITE 2400
SAINT PAUL MN 55101

Employer identification number

41-6031510

Unrelated business activity code

(See instructions.)

Book value of all assets at end of year

1001580688

Telephone number

651-224-5463

u

Part I
Unrelated Trade or Business Income

(A) Income

(B) Expenses

(C) Net

1a Gross receipts or sales

c Balance

1c

2 Cost of goods sold (Schedule A, line 7)

2

3 Gross profit. Subtract line 2 from line 1c

3

4a Capital gain net income (attach Schedule D)

4a

4b Net gain (loss) (Form 4797, Part II, line 17) (attach Form 4797)

4b

4c Capital loss deduction for trusts

4c

5 Income (loss) from partnership and S corporation (attach statement) SEE STMT 1

5

SEE STMT 1

-1,169,249

-1,169,249

6 Rent income (Schedule C)

6

7 Unrelated debt-financed income (Schedule E)

7

8 Interest, annuities, royalties, and rents from controlled organization (Schedule F)

8

9 Investment income of a section 501(c)(7), (9), or (17) organization (Schedule G)

9

10 Exploited exempt activity income (Schedule I)

10

11 Advertising income (Schedule J)

11

12 Other income (See instructions; attach schedule)

12

13 Total. Combine lines 3 through 12

13

-1,169,249

-1,169,249

Part II
Deductions Not Taken Elsewhere (See instructions for limitations on deductions.) (Deductions must be directly connected with the unrelated business income.)

14 Compensation of officers, directors, and trustees (Schedule K)

14

15 Salaries and wages

15

16 Repairs and maintenance

16

17 Bad debts

17

18 Interest (attach schedule) (see instructions)

18

19 Taxes and licenses

19

6,100

20 Depreciation (attach Form 4562)

20

21 Less depreciation claimed on Schedule A and elsewhere on return

21a

21b 0

22 Depletion

22

23 Contributions to deferred compensation plans

23

24 Employee benefit programs

24

25 Excess exempt expenses (Schedule I)

25

26 Excess readership costs (Schedule J)

26

27 Other deductions (attach schedule) SEE STATEMENT 2

27

SEE STATEMENT 2

10,660

16,760

28 Total deductions. Add lines 14 through 27

28

10,660

16,760

29 Unrelated business taxable income before net operating loss deduction. Subtract line 28 from line 13

29

-1,186,009

30 Deduction for net operating loss arising in tax years beginning on or after January 1, 2018 (see instructions)

30

31 Unrelated business taxable income. Subtract line 30 from line 29

31

-1,186,009

For Paperwork Reduction Act Notice, see instructions.
### Part III Total Unrelated Business Taxable Income

<table>
<thead>
<tr>
<th>Line</th>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>32</td>
<td>Total of unrelated business taxable income computed from all unrelated trades or businesses (see instructions)</td>
<td>32</td>
</tr>
<tr>
<td>33</td>
<td>Amounts paid for disallowed fringes</td>
<td>33</td>
</tr>
<tr>
<td>34</td>
<td>Charitable contributions (see instructions for limitation rules)</td>
<td>34</td>
</tr>
<tr>
<td>35</td>
<td>Total unrelated business taxable income before pre-2018 NOLs and specific deductions. Subtract line 34 from the sum of lines 32 and 33</td>
<td>35</td>
</tr>
<tr>
<td>36</td>
<td>Deductions for net operating loss arising in tax years beginning before January 1, 2018 (see instructions)</td>
<td>36</td>
</tr>
<tr>
<td>37</td>
<td>Total of unrelated business taxable income before specific deduction. Subtract line 36 from line 35</td>
<td>37</td>
</tr>
<tr>
<td>38</td>
<td>Specific deduction (Generally $1,000, but see line 38 instructions for exceptions)</td>
<td>38</td>
</tr>
<tr>
<td>39</td>
<td>Unrelated business taxable income. Subtract line 38 from line 37. If line 38 is greater than line 37, enter the smaller of zero or line 37</td>
<td>39</td>
</tr>
</tbody>
</table>

### Part IV Tax Computation

<table>
<thead>
<tr>
<th>Line</th>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>40</td>
<td>Organizations Taxable as Corporations. Multiply line 39 by 21% (0.21)</td>
<td>40</td>
</tr>
<tr>
<td>41</td>
<td>Trusts Taxable at Trust Rates. See instructions for tax computation. Income tax on the amount on line 39 from: Tax rate schedule or Schedule D (Form 1041)</td>
<td>41</td>
</tr>
<tr>
<td>42</td>
<td>Proxy tax. See instructions</td>
<td>42</td>
</tr>
<tr>
<td>43</td>
<td>Alternative minimum tax (trusts only)</td>
<td>43</td>
</tr>
<tr>
<td>44</td>
<td>Tax on Noncompliant Facility Income. See instructions</td>
<td>44</td>
</tr>
<tr>
<td>45</td>
<td>Total. Add lines 42, 43, and 44 to line 40 or 41, whichever applies</td>
<td>45</td>
</tr>
</tbody>
</table>

### Part V Tax and Payments

<table>
<thead>
<tr>
<th>Line</th>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>46a</td>
<td>Foreign tax credit (corporations attach Form 1118; trusts attach Form 1116)</td>
<td>46a</td>
</tr>
<tr>
<td>46b</td>
<td>Other credits (see instructions)</td>
<td>46b</td>
</tr>
<tr>
<td>46c</td>
<td>General business credit. Attach Form 3800 (see instructions)</td>
<td>46c</td>
</tr>
<tr>
<td>46d</td>
<td>Credit for prior year minimum tax (attach Form 8801 or 8827)</td>
<td>46d</td>
</tr>
<tr>
<td>46e</td>
<td>Total credits. Add lines 46a through 46d</td>
<td>46e</td>
</tr>
<tr>
<td>47</td>
<td>Subtract line 46e from line 45</td>
<td>47</td>
</tr>
<tr>
<td>48</td>
<td>Other taxes. Check if from: Form 4255</td>
<td>48</td>
</tr>
<tr>
<td>49</td>
<td>Form 8611</td>
<td>49</td>
</tr>
<tr>
<td>49</td>
<td>Form 8697</td>
<td>49</td>
</tr>
<tr>
<td>49</td>
<td>Form 8866</td>
<td>49</td>
</tr>
<tr>
<td>49</td>
<td>Other (att. sch.)</td>
<td>49</td>
</tr>
<tr>
<td>49</td>
<td>Total tax. Add lines 47 and 48 (see instructions)</td>
<td>49</td>
</tr>
<tr>
<td>50</td>
<td>2019 net 965 tax liability paid from Form 965-A or Form 965-B, Part II, column (k) line 3</td>
<td>50</td>
</tr>
<tr>
<td>51a</td>
<td>Payments: A 2018 overpayment credited to 2019</td>
<td>51a</td>
</tr>
<tr>
<td>51b</td>
<td>2019 estimated tax payments</td>
<td>51b</td>
</tr>
<tr>
<td>51c</td>
<td>Tax deposited with Form 8868</td>
<td>51c</td>
</tr>
<tr>
<td>51d</td>
<td>Foreign organizations: Tax paid or withheld at source (see instructions)</td>
<td>51d</td>
</tr>
<tr>
<td>51e</td>
<td>Backup withholding (see instructions)</td>
<td>51e</td>
</tr>
<tr>
<td>51f</td>
<td>Credit for small employer health insurance premiums (attach Form 8941)</td>
<td>51f</td>
</tr>
<tr>
<td>51g</td>
<td>Other credits, adjustments, and payments: Form 2439</td>
<td>51g</td>
</tr>
<tr>
<td>51g</td>
<td>Form 4136</td>
<td>51g</td>
</tr>
<tr>
<td>51g</td>
<td>Other</td>
<td>51g</td>
</tr>
<tr>
<td>51g</td>
<td>Total u</td>
<td>51g</td>
</tr>
<tr>
<td>52</td>
<td>Total payments. Add lines 51a through 51g</td>
<td>52</td>
</tr>
<tr>
<td>53</td>
<td>Estimated tax penalty (see instructions). Check if Form 2220 is attached</td>
<td>53</td>
</tr>
<tr>
<td>54</td>
<td>Tax due. If line 52 is less than the total of lines 49, 50, and 53, enter amount owed</td>
<td>54</td>
</tr>
<tr>
<td>55</td>
<td>Overpayment. If line 52 is larger than the total of lines 49, 50, and 53, enter amount overpaid</td>
<td>55</td>
</tr>
<tr>
<td>56</td>
<td>Enter the amount of line 55 you want: Credited to 2020 estimated tax</td>
<td>56</td>
</tr>
</tbody>
</table>

### Part VI Statements Regarding Certain Activities and Other Information (see instructions)

<table>
<thead>
<tr>
<th>Line</th>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>57</td>
<td>At any time during the 2019 calendar year, did the organization have an interest in or a signature or other authority over a financial account (bank, securities, or other) in a foreign country? If &quot;YES,&quot; the organization may have to file FinCEN Form 114, Report of Foreign Bank and Financial Accounts. If &quot;YES,&quot; enter the name of the foreign country here u</td>
<td>Yes No</td>
</tr>
<tr>
<td>58</td>
<td>During the tax year, did the organization receive a distribution from, or was it the grantor of, or transferor to, a foreign trust? If &quot;YES,&quot; see instructions for other forms the organization may have to file</td>
<td>Yes No</td>
</tr>
<tr>
<td>59</td>
<td>Enter the amount of tax-exempt interest received or accrued during the tax year u</td>
<td>59</td>
</tr>
</tbody>
</table>

### Sign Here

<table>
<thead>
<tr>
<th>Signature of officer</th>
<th>Date</th>
<th>Title</th>
</tr>
</thead>
</table>

| U | CFO |

### Paid Preparer

<table>
<thead>
<tr>
<th>Print/Type preparer's name</th>
<th>Preparer's signature</th>
<th>Date</th>
<th>Check if self-employed</th>
<th>PTIN</th>
<th>Firm's name</th>
<th>Firm's EIN</th>
<th>Firm's address</th>
<th>Phone no.</th>
</tr>
</thead>
<tbody>
<tr>
<td>AKINS HENKE AND COMPANY</td>
<td>AKINS HENKE</td>
<td></td>
<td></td>
<td></td>
<td>46-3220328</td>
<td></td>
<td>600 INWOOD AVENUE NORTH, SUITE 160</td>
<td>651-636-3806</td>
</tr>
</tbody>
</table>

Form 990-T (2019) THE SAINT PAUL FOUNDATION 41-6031510 Page 2

DAA
Schedule A – Cost of Goods Sold. Enter method of inventory valuation u

<table>
<thead>
<tr>
<th></th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4a</th>
<th>5</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Inventory at beginning of year</td>
<td></td>
<td></td>
<td></td>
<td>Total. Add lines 1 through 4b</td>
</tr>
<tr>
<td>2</td>
<td>Purchases</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4a</td>
</tr>
<tr>
<td>3</td>
<td>Cost of labor</td>
<td>4</td>
<td>5</td>
<td></td>
<td>4b</td>
</tr>
<tr>
<td>4a</td>
<td>Additional sec. 263A costs</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>(attach schedule)</td>
<td>4a</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4b</td>
<td>Other costs</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>(attach schedule)</td>
<td>4b</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Schedule C – Rent Income (From Real Property and Personal Property Leased With Real Property) (see instructions)

1. Description of property
   (1) N/A
   (2)  
   (3)  
   (4)  

2. Rent received or accrued
   (a) From personal property (if the percentage of rent for personal property is more than 10% but not more than 50%)  
   (b) From real and personal property (if the percentage of rent for personal property exceeds 50% or if the rent is based on profit or income)  
   (3a) Deductions directly connected with the income in columns 2(a) and 2(b) (attach schedule)

<table>
<thead>
<tr>
<th></th>
<th>1</th>
<th>2</th>
<th>3</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

(c) Total income. Add totals of columns 2(a) and 2(b). Enter here and on page 1, Part I, line 6, column (A) u

Schedule E – Unrelated Debt-Financed Income (see instructions)

1. Description of debt-financed property
   (1) N/A
   (2)  
   (3)  
   (4)  

2. Gross income from or allocable to debt-financed property
   (a) Straight line depreciation (attach schedule)
   (b) Other deductions (attach schedule)

<table>
<thead>
<tr>
<th></th>
<th>1</th>
<th>2</th>
<th>3</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

3. Deductions directly connected with or allocable to debt-financed property
   (a)  
   (b)  

<table>
<thead>
<tr>
<th></th>
<th>1</th>
<th>2</th>
<th>3</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

4. Amount of average acquisition debt on or allocable to debt-financed property (attach schedule)  
5. Average adjusted basis of or allocable to debt-financed property (attach schedule)  
6. Column 4 divided by column 5  
7. Gross income reportable (column 2 x column 6)  
8. Allocable deductions (column 6 x total of columns 3(a) and 3(b))

<table>
<thead>
<tr>
<th></th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tr>
</tbody>
</table>

Totals u

Total dividends-received deductions included in column 8 u
**Schedule F – Interest, Annuities, Royalties, and Rents From Controlled Organizations (see instructions)**

<table>
<thead>
<tr>
<th>1. Name of controlled organization</th>
<th>2. Employer identification number</th>
<th>Exempt Controlled Organizations</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>3. Net unrelated income (loss) (see instructions)</td>
</tr>
<tr>
<td>(1) N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(2)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(3)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(4)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Nonexempt Controlled Organizations**

<table>
<thead>
<tr>
<th>7. Taxable Income</th>
<th>8. Net unrelated income (loss) (see instructions)</th>
<th>9. Total of specified payments made</th>
<th>10. Part of column 9 that is included in the controlling organization's gross income</th>
<th>11. Deductions directly connected with income in column 10</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(2)</td>
<td></td>
<td></td>
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<tr>
<td>(3)</td>
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<tr>
<td>(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Totals**

Add columns 5 and 10. Enter here and on page 1, Part I, line 8, column (A).

Add columns 6 and 11. Enter here and on page 1, Part I, line 8, column (B).

**Schedule G – Investment Income of a Section 501(c)(7), (9), or (17) Organization (see instructions)**

<table>
<thead>
<tr>
<th>1. Description of income</th>
<th>2. Amount of income</th>
<th>3. Deductions directly connected with production of unrelated business income (attach schedule)</th>
<th>4. Set-asides (attach schedule)</th>
<th>5. Total deductions and set-asides (col. 3 plus col. 4)</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) N/A</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(2)</td>
<td></td>
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<td>(3)</td>
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<tr>
<td>(4)</td>
<td></td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

**Totals**

Enter here and on page 1, Part I, line 9, column (A).

Enter here and on page 1, Part I, line 9, column (B).

**Schedule I – Exploited Exempt Activity Income, Other Than Advertising Income (see instructions)**

<table>
<thead>
<tr>
<th>1. Description of exploited activity</th>
<th>2. Gross unrelated business income from trade or business</th>
<th>3. Expenses directly connected with production of unrelated business income</th>
<th>4. Net income (loss) from unrelated trade or business (column 2 minus column 3). If a gain, compute cols. 5 through 7.</th>
<th>5. Gross income from activity that is not unrelated business income</th>
<th>6. Expenses attributable to column 5</th>
<th>7. Excess exempt expenses (column 6 minus column 5, but not more than column 4).</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) N/A</td>
<td></td>
<td></td>
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<td></td>
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<td>(2)</td>
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<td>(3)</td>
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<td>(4)</td>
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</tr>
</tbody>
</table>

**Totals**

Enter here and on page 1, Part I, line 10, col. (A).

Enter here and on page 1, Part I, line 10, col. (B).

Enter here and on page 1, Part I, line 25.

**Schedule J – Advertising Income (see instructions)**

**Part I. Income From Periodicals Reported on a Consolidated Basis**

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
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<th></th>
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</tr>
</thead>
<tbody>
<tr>
<td>(1) N/A</td>
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<td>(2)</td>
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<td>(3)</td>
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<td>(4)</td>
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</tr>
</tbody>
</table>

**Totals (carry to Part II, line (5))**

DAA
## Part II  Income From Periodicals Reported on a Separate Basis

(For each periodical listed in Part II, fill in columns 2 through 7 on a line-by-line basis.)

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>(1)</td>
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<td>(2)</td>
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<td>(3)</td>
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<tr>
<td>(4)</td>
<td></td>
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</tr>
</tbody>
</table>

**Totals from Part I**

Enter here and on page 1, Part I, line 11, col. (A).  Enter here and on page 1, Part I, line 11, col. (B).  Enter here and on page 1, Part II, line 26.

**Totals, Part II (lines 1-5)**

**Schedule K – Compensation of Officers, Directors, and Trustees**

(see instructions)

<table>
<thead>
<tr>
<th>1. Name</th>
<th>2. Title</th>
<th>3. Percent of time devoted to business</th>
<th>4. Compensation attributable to unrelated business</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td></td>
<td>%</td>
<td></td>
</tr>
<tr>
<td>(1)</td>
<td></td>
<td>%</td>
<td></td>
</tr>
<tr>
<td>(2)</td>
<td></td>
<td>%</td>
<td></td>
</tr>
<tr>
<td>(3)</td>
<td></td>
<td>%</td>
<td></td>
</tr>
<tr>
<td>(4)</td>
<td></td>
<td>%</td>
<td></td>
</tr>
</tbody>
</table>

**Total. Enter here and on page 1, Part II, line 14**

U
### Part I  Unrelated Trade or Business Income

<table>
<thead>
<tr>
<th></th>
<th>(A) Income</th>
<th>(B) Expenses</th>
<th>(C) Net</th>
</tr>
</thead>
<tbody>
<tr>
<td>1a</td>
<td>Gross receipts or sales</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1b</td>
<td>Less returns and allowances</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1c</td>
<td>Balance</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Cost of goods sold (Schedule A, line 7)</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Gross profit. Subtract line 2 from line 1c</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>4a</td>
<td>Capital gain net income (attach Schedule D)</td>
<td>4a</td>
<td></td>
</tr>
<tr>
<td>4b</td>
<td>Net gain (loss) (Form 4797, Part II, line 17) (attach Form 4797)</td>
<td>4b</td>
<td></td>
</tr>
<tr>
<td>4c</td>
<td>Capital loss deduction for trusts</td>
<td>4c</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Income (loss) from partnership and S corporation (attach statement)</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>Rent income (Schedule C)</td>
<td>6</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Unrelated debt-financed income (Schedule E)</td>
<td>7</td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>Interest, annuities, royalties, and rents from a controlled organization (Schedule F)</td>
<td>8</td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Investment income of a section 501(c)(7), (9), or (17) organization (Schedule G)</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>Exploited exempt activity income (Schedule I)</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>Advertising income (Schedule J)</td>
<td>11</td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>Other income (See instructions; attach schedule)</td>
<td>SEE STMT 1</td>
<td>12</td>
</tr>
<tr>
<td>13</td>
<td>Total. Combine lines 3 through 12</td>
<td>13</td>
<td>107,319</td>
</tr>
</tbody>
</table>

### Part II  Deductions Not Taken Elsewhere

(See instructions for limitations on deductions.) (Deductions must be directly connected with the unrelated business income.)

<table>
<thead>
<tr>
<th></th>
<th>(A) Income</th>
<th>(B) Expenses</th>
<th>(C) Net</th>
</tr>
</thead>
<tbody>
<tr>
<td>14</td>
<td>Compensation of officers, directors, and trustees (Schedule K)</td>
<td>14</td>
<td></td>
</tr>
<tr>
<td>15</td>
<td>Salaries and wages</td>
<td>15</td>
<td>51,489</td>
</tr>
<tr>
<td>16</td>
<td>Repairs and maintenance</td>
<td>16</td>
<td></td>
</tr>
<tr>
<td>17</td>
<td>Bad debts</td>
<td>17</td>
<td></td>
</tr>
<tr>
<td>18</td>
<td>Interest (attach schedule) (see instructions)</td>
<td>18</td>
<td></td>
</tr>
<tr>
<td>19</td>
<td>Taxes and licenses</td>
<td>19</td>
<td></td>
</tr>
<tr>
<td>20</td>
<td>Depreciation (attach Form 4562)</td>
<td>20</td>
<td></td>
</tr>
<tr>
<td>21</td>
<td>Less depreciation claimed on Schedule A and elsewhere on return</td>
<td>21a</td>
<td></td>
</tr>
<tr>
<td>21b</td>
<td>0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>22</td>
<td>Depletion</td>
<td>22</td>
<td></td>
</tr>
<tr>
<td>23</td>
<td>Contributions to deferred compensation plans</td>
<td>23</td>
<td></td>
</tr>
<tr>
<td>24</td>
<td>Employee benefit programs</td>
<td>24</td>
<td>13,047</td>
</tr>
<tr>
<td>25</td>
<td>Excess exempt expenses (Schedule I)</td>
<td>25</td>
<td></td>
</tr>
<tr>
<td>26</td>
<td>Excess readership costs (Schedule J)</td>
<td>26</td>
<td></td>
</tr>
<tr>
<td>27</td>
<td>Other deductions (attach schedule)</td>
<td>SEE STATEMENT 2</td>
<td>27</td>
</tr>
<tr>
<td>28</td>
<td>Total deductions. Add lines 14 through 27</td>
<td>28</td>
<td>107,319</td>
</tr>
<tr>
<td>29</td>
<td>Unrelated business taxable income before net operating loss deduction. Subtract line 28 from line 13</td>
<td>29</td>
<td></td>
</tr>
<tr>
<td>30</td>
<td>Deduction for net operating loss arising in tax years beginning on or after January 1, 2018 (see instructions)</td>
<td>30</td>
<td></td>
</tr>
<tr>
<td>31</td>
<td>Unrelated business taxable income. Subtract line 30 from line 29</td>
<td>31</td>
<td>0</td>
</tr>
</tbody>
</table>
### Statement 1 - Form 990-T, Part I, Line 5 - Income (Loss) from Partnerships or S-Corps

<table>
<thead>
<tr>
<th>Name of Partnership or S-Corp</th>
<th>Gross Income</th>
<th>Direct Deductions (Part. only)</th>
<th>Net Income</th>
</tr>
</thead>
<tbody>
<tr>
<td>UBI FROM INV. PARTNERSHIPS</td>
<td>$ -1,169,249</td>
<td>$</td>
<td>$ -1,169,249</td>
</tr>
<tr>
<td>TOTAL</td>
<td>$ -1,169,249</td>
<td>$ 0</td>
<td>$ -1,169,249</td>
</tr>
</tbody>
</table>

### Statement 2 - Form 990-T, Part II, Line 28 - Other Deductions

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>PROFESSIONAL FEES</td>
<td>$ 10,660</td>
</tr>
<tr>
<td>TOTAL</td>
<td>$ 10,660</td>
</tr>
</tbody>
</table>
### Private Foundation Services

**Statement 1 - Form 990-T, Schedule M, Line 12 - Other Income**

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>PRIVATE FOUNDATION SERVICES</td>
<td>$107,319</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>$107,319</td>
</tr>
</tbody>
</table>

**Private Foundation Services**

**Statement 2 - Form 990-T, Schedule M, Line 28 - Other Deductions**

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>OVERHEAD</td>
<td>$42,800</td>
</tr>
<tr>
<td>EXPENSE IN EXCESS OF REVENUE DUE TO NO PROFIT MOTIVE</td>
<td>-17</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>$42,783</td>
</tr>
</tbody>
</table>
Election to Relinquish Net Operating Loss Carry Back Period

The Saint Paul Foundation
EIN 41-6031510
Form 990-T
Tax Year Ending December 31, 2019

The above mentioned taxpayer incurred a net operating loss in its tax year ended December 31, 2019, and is entitled to a carry back period of five years. The Foundation is electing to apply § 172(b)(3) under Rev. Proc. 2020-24 for 2019.

In accordance with Section 172(b)(3) of the Internal Revenue Code, taxpayer hereby elects to relinquish the entire carry back period with respect to the current net operating loss incurred in its tax year 2019.
### Part I Short-Term Capital Gains and Losses (See instructions.)

<table>
<thead>
<tr>
<th>(d) Proceeds</th>
<th>(e) Cost</th>
<th>(g) Adjustments to gain or loss from Form(s) 8949, Part I, line 2, column (g)</th>
<th>(h) Gain or (loss)</th>
</tr>
</thead>
<tbody>
<tr>
<td>(sales price)</td>
<td>(or other basis)</td>
<td>9849, Part I, line 2, column (g)</td>
<td>Subtract column (e) from column (d) and combine the result with column (g)</td>
</tr>
</tbody>
</table>

1a Totals for all short-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 1b.

1b Totals for all transactions reported on Form(s) 8949 with Box A checked.

2 Totals for all transactions reported on Form(s) 8949 with Box B checked.

3 Totals for all transactions reported on Form(s) 8949 with Box C checked.

<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>55,111</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

4 Short-term capital gain from installment sales from Form 6252, line 26 or 37.

5 Unused capital loss carryover (attach computation).

6 Net short-term capital gain or (loss). Combine lines 1 through 6 in column h.

### Part II Long-Term Capital Gains and Losses (See instructions.)

<table>
<thead>
<tr>
<th>(d) Proceeds</th>
<th>(e) Cost</th>
<th>(g) Adjustments to gain or loss from Form(s) 8949, Part I, line 2, column (g)</th>
<th>(h) Gain or (loss)</th>
</tr>
</thead>
<tbody>
<tr>
<td>(sales price)</td>
<td>(or other basis)</td>
<td>8949, Part II, line 2, column (g)</td>
<td>Subtract column (e) from column (d) and combine the result with column (g)</td>
</tr>
</tbody>
</table>

8a Totals for all long-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 8b.

8b Totals for all transactions reported on Form(s) 8949 with Box D checked.

9 Totals for all transactions reported on Form(s) 8949 with Box E checked.

10 Totals for all transactions reported on Form(s) 8949 with Box F checked.

<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>-31,540</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

11 Enter gain from Form 4797, line 7 or 9.

12 Long-term capital gain from installment sales from Form 6252, line 26 or 37.

13 Long-term capital gain or (loss) from like-kind exchanges from Form 8824.

14 Capital gain distributions (see instructions).

15 Net long-term capital gain or (loss). Combine lines 8a through 14 in column h.

### Part III Summary of Parts I and II

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>16</td>
<td></td>
</tr>
<tr>
<td>Enter excess of net short-term capital gain (line 7) over net long-term capital loss (line 15)</td>
<td></td>
</tr>
</tbody>
</table>

17 Net capital gain. Enter excess of net long-term capital gain (line 15) over net short-term capital loss (line 7).

18 Add lines 16 and 17. Enter here and on Form 1120, page 1, line 8, or the proper line on other returns.

Note: If losses exceed gains, see Capital Losses in the instructions.
**Part I**  
**Short-Term.** Transactions involving capital assets you held 1 year or less are generally short-term (see instructions). For long-term transactions, see page 2.

**Note:** You may aggregate all short-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS and for which no adjustments or codes are required. Enter the totals directly on Schedule D, line 1a; you aren't required to report these transactions on Form 8949 (see instructions).

**You must check Box A, B, or C below. Check only one box.** If more than one box applies for your short-term transactions, complete a separate Form 8949, page 1, for each applicable box. If you have more short-term transactions than will fit on this page for one or more of the boxes, complete as many forms with the same box checked as you need.

- **(A)** Short-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS (see Note above)
- **(B)** Short-term transactions reported on Form(s) 1099-B showing basis wasn't reported to the IRS
- **(C)** Short-term transactions not reported to you on Form 1099-B

---

<table>
<thead>
<tr>
<th>1</th>
<th>Description of property (Example: 100 sh. XYZ Co.)</th>
<th>Date acquired (Mo., day, yr.)</th>
<th>Date sold or disposed of (Mo., day, yr.)</th>
<th>Proceeds (sales price) (see instructions)</th>
<th>Cost or other basis. See the Note below and see Column (e) in the separate instructions</th>
<th>Adjustment, if any, to gain or loss. If you enter an amount in column (g), enter a code in column (f). See the separate instructions.</th>
<th>Gain or (loss). Subtract column (e) from column (d) and combine the result with column (g)</th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td><strong>LIQUIDATING DISTRIBUTION OF S-CORP</strong></td>
<td>01/01/19</td>
<td>12/31/19</td>
<td>55,111</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

2 **Totals.** Add the amounts in columns (d), (e), (g), and (h) (subtract negative amounts). Enter each total here and include on your Schedule D, line 1b (if Box A above is checked), line 2 (if Box B above is checked), or line 3 (if Box C above is checked).

<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Date</td>
<td>Amount of adjustment</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>55,111</td>
<td></td>
</tr>
</tbody>
</table>

**Note:** If you checked Box A above but the basis reported to the IRS was incorrect, enter in column (e) the basis as reported to the IRS, and enter an adjustment in column (g) to correct the basis. See Column (g) in the separate instructions for how to figure the amount of the adjustment.
### Business Activity Income (and allocation of Prior-2018 NOL)

A. Total Pre-2018 Net Operating Loss used by 2019 income (See NOL Worksheet)  

<table>
<thead>
<tr>
<th>Code</th>
<th>Unrelated Business Income Activity with Income</th>
<th>Pre-2018 NOL (Limited to Income)</th>
<th>Net Income before Loss</th>
</tr>
</thead>
<tbody>
<tr>
<td>900099</td>
<td>PRIVATE FOUNDATION SERVICES</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Business Activity Losses

<table>
<thead>
<tr>
<th>Code</th>
<th>Unrelated Business Income Activity with Losses</th>
<th>Current Year Loss</th>
</tr>
</thead>
<tbody>
<tr>
<td>900099</td>
<td>PASSTHROUGH INCOME FROM INV</td>
<td>$-1,186,009</td>
</tr>
</tbody>
</table>
**Schedule M Loss Carryover Calculation**

Name: **THE SAINT PAUL FOUNDATION**

Taxpayer Identification Number: **41-6031510**

Unincorporated Business Income Tax Code: **900099**  
Activity: **OTHER UNRELATED BUSINESS ACTIVIT**

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Activity income</td>
</tr>
<tr>
<td>2</td>
<td>Activity deductions</td>
</tr>
<tr>
<td>3</td>
<td>Activities income or loss, after deductions</td>
</tr>
<tr>
<td>4</td>
<td>Losses carried over to this year (do not include amounts prior to 2018)</td>
</tr>
<tr>
<td>5</td>
<td>Enter 100% of the amount on Line 3, if both lines 3 and 4 are positive.</td>
</tr>
<tr>
<td>6</td>
<td>Take the lesser of Line 4 or Line 5. <strong>Enter here and on Line 30 of Form 990-T or Schedule M</strong></td>
</tr>
<tr>
<td>7</td>
<td>Remaining losses to be carried forward to 2020 (Subtract Line 6 from line 4)</td>
</tr>
<tr>
<td>8</td>
<td>If line 3 is less than zero, enter that amount here as a positive number</td>
</tr>
<tr>
<td>9</td>
<td>Total loss carried forward to 2020 (Add lines 7 and 8)</td>
</tr>
</tbody>
</table>
Form 926
Department of the Treasury
Internal Revenue Service

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

OMB No. 1545-0026

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

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

Part I U.S. Transferor Information (see instructions)

Name of transferor

THE SAINT PAUL FOUNDATION

41–6031510

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? Yes 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 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

         Identifying number

3 c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? Yes No

   If not, list the name and employer identification number (EIN) of the parent corporation.

   Name of parent corporation

   EIN of parent corporation

4 d Have basis adjustments under section 367(a)(4) been made? Yes No

Part II Transferee Foreign Corporation Information (see instructions)

Name of transferee (foreign corporation)

AZTEC FINANCIAL SERVICES GUERNSEY L

41–1765364

5a Identifying number, if any

5b Reference ID number (see instructions)

Address (including country)

EAST WING, TRAFALGAR COURT
ST PETER PORT GK GY1 3PP GUERNSEY

Country code of country of incorporation or organization (see instructions)

UK

Foreign law characterization (see instructions)

CORPORATION

6 Is the transferee foreign corporation a controlled foreign corporation? Yes No

For Paperwork Reduction Act Notice, see separate instructions.

DAA
Form 926 (Rev. 11-2018)  THE SAINT PAUL FOUNDATION  41–6031510

Part III  Information Regarding Transfer of Property (see instructions)

Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td>03/16/18</td>
<td></td>
<td>90,588</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? ☒ Yes ☐ No

If “Yes,” skip the remainder of Part III and go to Part IV.

Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? ☐ Yes ☒ No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? ☒ Yes ☐ No

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? ☒ Yes ☐ No

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? ☒ Yes ☐ No

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 u $ 90,588

13 Did the transferor transfer property described in section 367(d)(4)? ☒ Yes ☐ No

If “No,” skip Section C and questions 14a through 15.

Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm’s length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

DAA
14a 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? ................................................................. Yes ☐ No ☐

c 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) u $ .................................................................

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 ☐

Supplemental Part III Information Required To Be Reported (see instructions)

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 % (b) After %

17 Type of nonrecognition transaction (see instructions) u IRC SECTION 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) ................................................................. Yes ☐ No ☐
   b Gain recognition under section 904(f)(5)(F) ................................................................. Yes ☐ No ☐
   c Recapture under section 1503(d) ........................................................................ Yes ☐ No ☐
   d Exchange gain under section 987 ........................................................................ Yes ☐ No ☐

19 Did this transfer result from a change in entity classification? ................................................................. Yes ☐ No ☐

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
   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) u $ .................................................................
   c 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 covered by section 367(e)(1)? See instructions ................................................................. Yes ☐ No ☐
Part I  U.S. Transferor Information (see instructions)

Name of transferor: THE SAINT PAUL FOUNDATION

Identifying number: 41-6031510

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.

   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 [ ] 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).

Name of controlling shareholder: 
Identifying number: 

Part I

Name of transferee (foreign corporation): THE COMMUNITY INVESTMENT GROUP

Identifying number: 41-1765364

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.

   a. Did the partner pick up its pro rata share of gain on the transfer of partnership assets? [ ] Yes [x] No

   b. Is the partner disposing of its entire interest in the partnership? [ ] Yes [x] No

   c. Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? [ ] Yes [x] No

Part II  Transferee Foreign Corporation Information (see instructions)

4. Name of transferee (foreign corporation): CE MINING III MND LIMITED

5a. Identifying number, if any: 

5b. Reference ID number (see instructions): CEMININGIIIIMND

6. Address (including country):
   94 SOLARIS AVENUE, P.O. BOX 1348
   GRAND CAYMAN, CJ KY1-1108, CAYMAN ISLANDS

7. Country code of country of incorporation or organization (see instructions):
   CJ

8. Foreign law characterization (see instructions):
   CORPORATION

9. Is the transferee foreign corporation a controlled foreign corporation? [x] Yes [ ] No

For Paperwork Reduction Act Notice, see separate instructions.
## Part III  Information Regarding Transfer of Property

(see instructions)

### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td>20,325</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
   If “Yes,” skip the remainder of Part III and go to Part IV.  
   □ Yes □ No

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
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<td></td>
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</tr>
<tr>
<td>Other property (not listed under another category)</td>
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</tr>
<tr>
<td>Property with built-in loss</td>
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<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
   □ Yes □ No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
   □ Yes □ No  
   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?  
   □ Yes □ No  
   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?  
   □ Yes □ No  
   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 u. $ ________________  
   □ Yes □ No

13 Did the transferor transfer property described in section 367(d)(4)?  
   □ Yes □ No  
   If “No,” skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
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<tr>
<td>Totals</td>
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<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
14a 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? ☐ Yes ☐ No

c 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

Supplemental Part III Information Required To Be Reported (see instructions)

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 ______ % (b) After ______ %

17 Type of nonrecognition transaction (see instructions) IRC SECTION 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) ☐ Yes ☐ No
   b Gain recognition under section 904(f)(5)(F) ☐ Yes ☐ No
   c Recapture under section 1503(d) ☐ Yes ☐ No
   d Exchange gain under section 987 ☐ Yes ☐ No

19 Did this transfer result from a change in entity classification? ☐ Yes ☐ No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
   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) $.
   c 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 covered by section 367(e)(1)? See instructions. ☐ Yes ☐ No
**Form 926**

**Part I: U.S. Transferor Information** (see instructions)

**Name of transferor**

THE SAINT PAUL FOUNDATION

**Identifying number**

41-6031510

---

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  
   - Yes [ ]  
   - No [X]

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 [ ]  
      - No [X]

   b. Did the transferor remain in existence after the transfer?  
      - Yes [ ]
      - No [X]

   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 [ ]  
      - No [X]

      If not, list the name and employer identification number (EIN) of the parent corporation.

   **Name of parent corporation**

   **EIN of parent corporation**

   ---

   d. Have basis adjustments under section 367(a)(4) been made?  
      - Yes [ ]
      - No [X]

   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.

   a. List the name and EIN of the transferor's partnership.

   **Name of partnership**

   **EIN of partnership**

   THE COMMUNITY INVESTMENT GROUP

   41-1765364

   b. Did the partner pick up its pro rata share of gain on the transfer of partnership assets?  
      - Yes [ ]  
      - No [X]

   c. Is the partner disposing of its entire interest in the partnership?  
      - Yes [ ]
      - No [X]

   d. Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market?  
      - Yes [ ]  
      - No [X]

---

**Part II: Transferee Foreign Corporation Information** (see instructions)

4. Name of transferee (foreign corporation)

CE MINING III RAMBLER LIMITED

5a. Identifying number, if any

---

6. Address (including country)

94 SOLARIS AVENUE, P.O. BOX 1348

GRAND CAYMAN  CJ KY1-1108  CAYMAN ISLANDS

5b. Reference ID number (see instructions)

CEMININGIII

7. Country code of country of incorporation or organization (see instructions)

CJ

8. Foreign law characterization (see instructions)

CORPORATION

---

9. Is the transferee foreign corporation a controlled foreign corporation?  
   - Yes [X]  
   - No [ ]

---

For Paperwork Reduction Act Notice, see separate instructions.
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>10,532</td>
</tr>
</tbody>
</table>

10 **Was cash the only property transferred?**

   - [X] Yes  [ ] No

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
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<td></td>
<td></td>
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<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Totals**

11 **Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?**

   - [ ] Yes  [X] No

12a **Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?**

   - [ ] Yes  [X] No

   - **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?

   - [ ] Yes  [X] No

   - **c** Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?

   - [ ] Yes  [X] No

   - **d** Did the transferor transfer property described in section 367(d)(4)?

   - [ ] Yes  [ ] No

   - **Enter the transferred loss amount included in gross income as required under section 91 u $**

13 **Did the transferred loss amount included in gross income as required under section 91 u $**

   - [ ] Yes  [X] No

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Totals**
14a 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?  
  
  Yes ☐  
  No ☐

c 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) u $  
  
  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 ☐

Supplemental Part III Information Required To Be Reported (see instructions)  

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 _________ %  
(b) After _________ %  
  
  IRC SECTION 351  

17 Type of nonrecognition transaction (see instructions)  

a Gain recognition under section 904(f)(3)  
  
  Yes ☐  
  No ☐

b Gain recognition under section 904(f)(5)(F)  
  
  Yes ☐  
  No ☐

c Recapture under section 1503(d)  
  
  Yes ☐  
  No ☐

d Exchange gain under section 987  
  
  Yes ☐  
  No ☐

18 Indicate whether any transfer reported in Part III is subject to any of the following.  

a Gain recognition under section 904(f)(3)  
  
  Yes ☐  
  No ☐

b Gain recognition under section 904(f)(5)(F)  
  
  Yes ☐  
  No ☐

c Recapture under section 1503(d)  
  
  Yes ☐  
  No ☐

d Exchange gain under section 987  
  
  Yes ☐  
  No ☐

19 Did this transfer result from a change in entity classification?  
  
  Yes ☐  
  No ☐

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions  
  
  Yes ☐  
  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) u $  

  c 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 covered by section 367(e)(1)? See instructions  
  
  Yes ☐  
  No ☐

Form 926 (Rev. 11-2018)
Form 926
(Rev. November 2018)
Department of the Treasury
Internal Revenue Service

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

u 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
Attachment
Sequence No. 128

Part I  U.S. Transferor Information (see instructions)

Name of transferor

THE SAINT PAUL FOUNDATION

Identifying number (see instructions)

41–6031510

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.

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 [ ] 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

Identifying number


c  If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? 

[ ] Yes [ ] No

If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation

EIN of parent corporation


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 section 367), complete questions 3a through 3d.

a  List the name and EIN of the transferor’s partnership.

Name of partnership

EIN of partnership


Part II  Transferee Foreign Corporation Information (see instructions)

4  Name of transferee (foreign corporation)

HARBERT EUROPEAN REAL ESTATE FUND V

5a  Identifying number, if any

98–1397659

5b  Reference ID number

(see instructions)

6  Address (including country)

2100 THIRD AVE N, SUITE 600  ALABAMA

BIRMINGHAM  35203

7  Country code of country of incorporation or organization (see instructions)

UK

8  Foreign law characterization (see instructions)

LIMITED PARTNERSHIP

9  Is the transferee foreign corporation a controlled foreign corporation? 

[X] Yes [ ] No

For Paperwork Reduction Act Notice, see separate instructions.

DAA

Form 926 (Rev. 11-2018)
Part III  Information Regarding Transfer of Property (see instructions)

Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
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<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td>SEE STATEMENT 1</td>
<td></td>
<td>758,205</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
   If "Yes," skip the remainder of Part III and go to Part IV.  
   Yes [X]  No

Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
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<tr>
<td>Totals</td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
   Yes [ ]  No [X]

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
   Yes [ ]  No [X]

   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?  
   Yes [ ]  No [X]

   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?  
   Yes [ ]  No [X]

   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 911 $  

13 Did the transferor transfer property described in section 367(d)(4)?  
   Yes [X]  No [ ]

   If "No," skip Section C and questions 14a through 15.

Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
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Form 926 (Rev. 11-2018)
14a 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?  
   Yes  No

c 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

Supplemental Part III Information Required To Be Reported (see instructions)

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 %  (b) After %

17 Type of nonrecognition transaction (see instructions)  
   IRC SECTION 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)  
      Yes  X  No
   b Gain recognition under section 904(f)(5)(F)  
      Yes  X  No
   c 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

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
   If "Yes," complete lines 20b and 20c.
      Yes  X  No
   b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) $  
   c 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 covered by section 367(e)(1)? See instructions  
   Yes  X  No
# Form 926

## Part I: U.S. Transferor Information

### Name of transferor

**THE SAINT PAUL FOUNDATION**

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?</td>
<td>No</td>
</tr>
<tr>
<td>2. If the transferor was a corporation, complete questions 2a through 2d.</td>
<td></td>
</tr>
<tr>
<td>2a. 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?</td>
<td>No</td>
</tr>
<tr>
<td>2b. Did the transferor remain in existence after the transfer?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

**Controlling shareholder**

<table>
<thead>
<tr>
<th>Shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Name of parent corporation**

**EIN of parent corporation**

**AETHER REAL ASSETS IV, LP**

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.</td>
<td></td>
</tr>
<tr>
<td>3a. List the name and EIN of the transferor's partnership.</td>
<td></td>
</tr>
</tbody>
</table>

**Name of partnership**

**EIN of partnership**

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td>AETHER REAL ASSETS IV, LP</td>
<td>47-4720841</td>
</tr>
</tbody>
</table>

### Additional Questions

**Have basis adjustments under section 367(a)(4) been made?**

Yes No

## Part II: Transferee Foreign Corporation Information

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>4. Name of transferee (foreign corporation)</td>
<td>CE MINING III MND LIMITED</td>
</tr>
<tr>
<td>5a. Identifying number, if any</td>
<td></td>
</tr>
<tr>
<td>5b. Reference ID number (see instructions)</td>
<td>CEMININGIIIMND</td>
</tr>
</tbody>
</table>

**Address (including country)**

94 SOLARIS AVENUE, P.O. BOX 1348

**Country code of country of incorporation or organization (see instructions)**

**Foreign law characterization (see instructions)**

**CORPORATION**

**Is the transferee foreign corporation a controlled foreign corporation?**

No Yes
### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>257,673</td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
   [X] Yes  [ ] No  

**If "Yes," skip the remainder of Part III and go to Part IV.**

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Property with built-in loss**  

| Totals | | | | | |

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
   [ ] Yes  [X] No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
   [X] Yes  [ ] No

   **If "Yes," go to line 12b.**

12b 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?  
   [X] Yes  [ ] No

   **If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.**

12c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?  
   [X] Yes  [ ] No

   **If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.**

12d Enter the transferred loss amount included in gross income as required under section 91 u $  
   [X] Yes  [ ] No

13 Did the transferor transfer property described in section 367(d)(4)?  
   [X] Yes  [ ] No  

   **If "No," skip Section C and questions 14a through 15.**

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Totals | | | | | | | |
14a 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? Yes ☐ No ☐

c 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 ☐

Supplemental Part III Information Required To Be Reported (see instructions)

<table>
<thead>
<tr>
<th>Line</th>
<th>Description</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>14a</td>
<td>Transfer intangible property with useful life exceeding 20 years</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>b</td>
<td>Intangible property with indefinite useful life</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>c</td>
<td>Choice of 20-year inclusion period</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>d</td>
<td>Estimated income or cost reduction beyond 20 years</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>15</td>
<td>Platform contribution</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

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.

<table>
<thead>
<tr>
<th>Before</th>
<th>After</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ %</td>
<td>☐ %</td>
</tr>
</tbody>
</table>

17 Type of nonrecognition transaction (see instructions) IRC SECTION 351

18 Indicate whether any transfer reported in Part III is subject to any of the following.

<table>
<thead>
<tr>
<th>Type</th>
<th>Subject to</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ a</td>
<td>Gain recognition under section 904(f)(3)</td>
</tr>
<tr>
<td>☐ b</td>
<td>Gain recognition under section 904(f)(5)(F)</td>
</tr>
<tr>
<td>☐ c</td>
<td>Recapture under section 1503(d)</td>
</tr>
<tr>
<td>☐ d</td>
<td>Exchange gain under section 987</td>
</tr>
</tbody>
</table>

19 Did this transfer result from a change in entity classification? Yes ☐ No ☐

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? Yes ☐ No ☐

If "Yes," complete lines 20b and 20c.

<table>
<thead>
<tr>
<th>Type</th>
<th>Subject to</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ b</td>
<td>Total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) $</td>
</tr>
</tbody>
</table>
| ☐ c | 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 covered by section 367(e)(1)? Yes ☐ No ☐

---

Form 926 (Rev. 11-2018)
Return by a U.S. Transferor of Property to a Foreign Corporation

Part I U.S. Transferor Information

Name of transferor

THE SAINT PAUL FOUNDATION

Identifying number (see instructions)

41-6031510

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? Yes No

2 If the transferor was a corporation, complete questions 2a through 2d.

2a 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 No

2b 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

Identifying number

Name of parent corporation

EIN of parent corporation

c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? Yes No

If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation

EIN of parent corporation

d Have basis adjustments under section 367(a)(4) been made? Yes 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.

3a List the name and EIN of the transferor’s partnership.

Name of partnership

EIN of partnership

AETHER REAL ASSETS IV, LP

47-4720841

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 No

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

Name of transferee (foreign corporation)

CE MINING III RAMBLER LIMITED

5a Identifying number, if any

5b Reference ID number (see instructions)

CEMININGIII

6 Address (including country)

94 SOLARIS AVENUE, P.O. BOX 1348

GRAND CAYMAN CJ KY1-1108 CAYMAN ISLANDS

7 Country code of country of incorporation or organization (see instructions)

CJ

8 Foreign law characterization (see instructions)

CORPORATION

9 Is the transferee foreign corporation a controlled foreign corporation? Yes No

For Paperwork Reduction Act Notice, see separate instructions.
**Part III  Information Regarding Transfer of Property** (see instructions)

### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>133,514</td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
If "Yes," skip the remainder of Part III and go to Part IV.  
If "No," continue to line 12.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
If "Yes," go to line 12b.

12a 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.

12b 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," continue to line 12d.

12c 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," go to line 13.

12d Enter the transferred loss amount included in gross income as required under section 911 $  
If "No," skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Arm's length price on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

**DAA**
14a 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?

[ ] Yes [ ] No

c 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) u $ 

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)

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 [ ] % (b) After [ ] %

17 Type of nonrecognition transaction (see instructions) u IRC SECTION 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) [ ] Yes [ ] No

b Gain recognition under section 904(f)(5)(F) [ ] Yes [ ] No

c Recapture under section 1503(d) [ ] Yes [ ] No

d Exchange gain under section 987 [ ] Yes [ ] No

19 Did this transfer result from a change in entity classification?

[ ] Yes [ ] No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

[ ] Yes [ ] 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) u $ 

c 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 covered by section 367(e)(1)? See instructions 

[ ] Yes [ ] No

Form 926 (Rev. 11-2018)
Part I  U.S. Transferor Information (see instructions)

Name of transferor

THE SAINT PAUL FOUNDATION

Identifying number (see instructions)

41–6031510

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  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?  No

b Did the transferor remain in existence after the transfer?  No

If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder

Identifying number

Name of parent corporation

EIN of parent corporation

Name of partnership

EIN of partnership

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.

a List the name and EIN of the transferor's partnership.

COMMONFUND CAPITAL NATURAL RESOURCE

37–1656529

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?  No

d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market?  No

Part II  Transferee Foreign Corporation Information (see instructions)

Name of transferee (foreign corporation)

AZTEC FINANCIAL SERVICES GUERNSEY L

5a Identifying number, if any

5b Reference ID number (see instructions)

Address (including country)

EAST WING, TRAFALGAR COURT

ST PETER PORT  GY1 3PP  GUERNSEY

Country code of country of incorporation or organization (see instructions)

UK

8 Foreign law characterization (see instructions)

CORPORATION

9 Is the transferee foreign corporation a controlled foreign corporation?  No

For Paperwork Reduction Act Notice, see separate instructions.
### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td>03/16/18</td>
<td></td>
<td></td>
<td></td>
<td>137,816</td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
- Yes □  No □  ☑

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
- Yes □  No □  ☑

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
- Yes □  No □  ☑

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?  
- Yes □  No □  ☑

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?  
- Yes □  No □  ☑

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 u  
- Yes □  No □  ☑

13 Did the transferor transfer property described in section 367(d)(4)?  
- Yes □  No □  ☑

If "No," skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

Form 926 (Rev. 11-2018)
Part IV  Additional Information Regarding Transfer of Property (see instructions)

14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  
   No ❌ Yes ✔

b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  
   No ❌ Yes ✔

c 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?  
   No ❌ Yes ✔

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) u $ __________.

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)?  
   No ❌ Yes ✔

Supplemental Part III Information Required To Be Reported (see instructions)

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 _______%  (b) After _______%

17 Type of nonrecognition transaction (see instructions) u IRC SECTION 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)  
      Yes X No
   b Gain recognition under section 904(f)(5)(F)  
      Yes X No
   c 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

20a 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) u $ __________.

   c 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 covered by section 367(e)(1)? See instructions  
   Yes X No
Return by a U.S. Transferor of Property
to a Foreign Corporation

Part I  U.S. Transferor Information (see instructions)

Name of transferor

THE SAINT PAUL FOUNDATION

Identifying number

41-6031510

Identifying number

1  Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  
   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?  
      No

   b  Did the transferor remain in existence after the transfer?  
      No

      If not, list the controlling shareholder(s) and their identifying number(s).  

Controlling shareholder

Identifying number

Name of parent corporation

EIN of parent corporation

3  c  If the transferor was a member of an affiliated group filing a consolidated return, was it the parent
    corporation?  
    No

    If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation

EIN of parent corporation

4  d  Have basis adjustments under section 367(a)(4) been made?  
    No

Part II  Transferee Foreign Corporation Information (see instructions)

Name of transferee (foreign corporation)

HARBERT EUROPEAN REAL ESTATE FUND V

Identifying number

98-1397659

5a  Identifying number, if any

5b  Reference ID number

(see instructions)

Address (including country)

2100 3RD AVE N, SUITE 600  
BIRMINGHAM 35203  
ALABAMA

Country code of country of incorporation or organization (see instructions)

UK

8  Foreign law characterization (see instructions)

LIMITED PARTNERSHIP

9  Is the transferee foreign corporation a controlled foreign corporation?  
   Yes

For Paperwork Reduction Act Notice, see separate instructions.
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
   If “Yes,” skip the remainder of Part III and go to Part IV.  
   Yes [X]  No [ ]

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
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<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
   Yes [ ]  No [X]

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
   Yes [ ]  No [X]

   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?  
   Yes [ ]  No [X]

   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?  
   Yes [ ]  No [X]

   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 u  $ __________________  
   Yes [ ]  No [X]

13 Did the transferor transfer property described in section 367(d)(4)?  
   Yes [ ]  No [X]

   If “No,” skip Section C and questions 14a through 15.

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
Additional Information Regarding Transfer of Property (see instructions)

14a 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? .......................................................... Yes No

c 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) u $ ..........................................................

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

Supplemental Part III Information Required To Be Reported (see instructions)

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 % (b) After %

17 Type of nonrecognition transaction (see instructions) u

18 Indicate whether any transfer reported in Part III is subject to any of the following.
   a Gain recognition under section 904(f)(3) .......................................................... Yes No
   b Gain recognition under section 904(f)(5)(F) .......................................................... Yes No
   c Recapture under section 1503(d) .......................................................... Yes No
   d Exchange gain under section 987 .......................................................... Yes No

19 Did this transfer result from a change in entity classification? .......................................................... Yes No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
   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) u $ ..........................................................
   c 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 covered by section 367(e)(1)? See instructions .......................................................... Yes No

THE SAINT PAUL FOUNDATION 41-6031510

Form 926 (Rev. 11-2018)
<table>
<thead>
<tr>
<th>Date of Transfer</th>
<th>Description of Property</th>
<th>FMV on Date of Transfer</th>
<th>Cost or Other Basis</th>
<th>Gain Recognized on Transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>8/16/19</td>
<td></td>
<td>$291,352</td>
<td>$</td>
<td>$</td>
</tr>
<tr>
<td>12/02/19</td>
<td></td>
<td>466,853</td>
<td></td>
<td></td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
<td>$758,205</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>
### Part I U.S. Transferor Information (see instructions)

<table>
<thead>
<tr>
<th>Name of transferor</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td>THE SAINT PAUL FOUNDATION</td>
<td>41–6031510</td>
</tr>
</tbody>
</table>

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  
   - Yes [ ]  
   - No [X]  

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?  
      - Yes [X]  
      - No [ ]  
     If not, list the controlling shareholder(s) and their identifying number(s).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
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<tr>
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<td></td>
</tr>
</tbody>
</table>

3. 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.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

4. Have basis adjustments under section 367(a)(4) been made?  
   - Yes [X]  
   - No [ ]  

5. 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.
   - a. List the name and EIN of the transferor's partnership.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
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<tr>
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<td></td>
</tr>
</tbody>
</table>

6. Did the partner pick up its pro rata share of gain on the transfer of partnership assets?  
   - Yes [ ]  
   - No [X]  

7. Is the partner disposing of its entire interest in the partnership?  
   - Yes [X]  
   - No [ ]  

8. Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market?  
   - Yes [X]  
   - No [ ]  

### Part II Transferee Foreign Corporation Information (see instructions)

<table>
<thead>
<tr>
<th>Name of transferee (foreign corporation)</th>
<th>Identifying number, if any</th>
</tr>
</thead>
<tbody>
<tr>
<td>WP GG EUROPA (CAYMAN-B), L.P.</td>
<td>98–1458202</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Address (including country)</th>
<th>Country code of country of incorporation or organization (see instructions)</th>
<th>Foreign law characterization (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>CAYMAN CORPORATE CENTRE, 27 HOSPITA CJ</td>
<td>CAYMAN ISLANDS</td>
<td>CORPORATION</td>
</tr>
<tr>
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</tbody>
</table>

9. Is the transferee foreign corporation a controlled foreign corporation?  
   - Yes [X]  
   - No [ ]  

Go to www.irs.gov/Form926 for instructions and the latest information.
## Part III Information Regarding Transfer of Property (see instructions)

### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td>12/31/19</td>
<td></td>
<td>192,500</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? 

If "Yes," skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? 

Yes No

12a 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 u $ 

13 Did the transferor transfer property described in section 367(d)(4)? 

If "No," skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals
Additional Information Regarding Transfer of Property (see instructions)

14a 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? ☐ Yes ☐ No

c 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) u $ ___________

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

Supplemental Part III Information Required To Be Reported (see instructions)

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 __________ %  (b) After __________ %

17 Type of nonrecognition transaction (see instructions) u ___________

18 Indicate whether any transfer reported in Part III is subject to any of the following.
   a Gain recognition under section 904(f)(3) ☐ Yes ☒ No
   b Gain recognition under section 904(f)(5)(F) ☐ Yes ☒ No
   c Recapture under section 1503(d) ☐ Yes ☒ No
   d Exchange gain under section 987 ☐ Yes ☒ No

19 Did this transfer result from a change in entity classification? ☐ Yes ☒ No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions.
   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) u $ ___________
   c 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 covered by section 367(e)(1)? See instructions. ☐ Yes ☒ No
### Part I  U.S. Transferor Information (see instructions)

<table>
<thead>
<tr>
<th>Name of transferor</th>
<th>Identifying number (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>THE SAINT PAUL FOUNDATION</strong></td>
<td>41–6031510</td>
</tr>
</tbody>
</table>

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? [ ] Yes [x] No

2. If the transferrer was a corporation, complete questions 2a through 2d.
   a. If the transfer was a section 361(a) or (b) transfer, was the transferrer controlled (under section 368(c)) by five or fewer domestic corporations? [ ] Yes [x] No
   b. Did the transferrer remain in existence after the transfer? [ ] Yes [x] No

   If not, list the controlling shareholder(s) and their identifying number(s).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tr>
</tbody>
</table>

   c. If the transferrer 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.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
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<td></td>
</tr>
</tbody>
</table>

   d. Have basis adjustments under section 367(a)(4) been made? [ ] Yes [x] No

3. If the transferrer was a partner in a partnership that was the actual transferrer (but is not treated as such under section 367), complete questions 3a through 3d.
   a. List the name and EIN of the transferrer's partnership.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>THE COMMUNITY INVESTMENT GROUP</strong></td>
<td>41–1765364</td>
</tr>
<tr>
<td>b. Did the partner pick up its pro rata share of gain on the transfer of partnership assets? [ ] Yes [x] No</td>
<td></td>
</tr>
<tr>
<td>c. Is the partner disposing of its entire interest in the partnership? [x] Yes [ ] No</td>
<td></td>
</tr>
<tr>
<td>d. Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? [x] Yes [ ] No</td>
<td></td>
</tr>
</tbody>
</table>

### Part II  Transferee Foreign Corporation Information (see instructions)

4. Name of transferee (foreign corporation)

<table>
<thead>
<tr>
<th><strong>ANOKION SA</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Address (including country)</td>
</tr>
<tr>
<td><strong>EN RUCHOZ, CH. DE LA DENT D’OCHE 1A</strong></td>
</tr>
<tr>
<td><strong>ECUBLENS SZ CH-1024 SWITZERLAND</strong></td>
</tr>
</tbody>
</table>

5a. Identifying number, if any

5b. Reference ID number (see instructions)

   | **ANOKION** |

6. Address (including country)

   | **ANOKION SA** |
   | **EN RUCHOZ, CH. DE LA DENT D’OCHE 1A** |
   | **ECUBLENS SZ CH-1024 SWITZERLAND** |

7. Country code of country of incorporation or organization (see instructions)

   | **SZ** |

8. Foreign law characterization (see instructions)

   | **CORPORATION** |

9. Is the transferee foreign corporation a controlled foreign corporation? [x] Yes [ ] No

For Paperwork Reduction Act Notice, see separate instructions.

Form 926 (Rev. 11-2018) DAA
## Part III Information Regarding Transfer of Property (see instructions)

### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 **Was cash the only property transferred?**

If “Yes,” skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>06/06/19</td>
<td>COMMON &amp; PREFERRED STOCK</td>
<td>209</td>
<td>209</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Other property (not listed under another category)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property with built-in loss</td>
</tr>
<tr>
<td>Totals</td>
</tr>
<tr>
<td>209 209</td>
</tr>
</tbody>
</table>

11 **Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?**

12a **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 u $**

13 **Did the transferor transfer property described in section 367(d)(4)?**

If “No,” skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Totals</th>
</tr>
</thead>
</table>

Form 926 (Rev. 11-2018)
### Additional Information Regarding Transfer of Property

#### Part IV

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>c 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?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>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) u $</td>
<td></td>
<td></td>
</tr>
<tr>
<td>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)?</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

### Supplemental Part III Information Required To Be Reported

#### IRC SECTION 351

<table>
<thead>
<tr>
<th>Type of nonrecognition transaction (see instructions)</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>a Gain recognition under section 904(f)(3)</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>b Gain recognition under section 904(f)(5)(F)</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>c Recapture under section 1503(d)</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>d Exchange gain under section 987</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

#### Exchange gain under section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions

a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) u $ 

c 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 covered by section 367(e)(1)? See instructions | Yes | No |
Return by a U.S. Transferor of Property to a Foreign Corporation

Part I  U.S. Transferor Information (see instructions)

Name of transferor

THE SAINT PAUL FOUNDATION

41-6031510

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? □ Yes □ 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 □ 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

Identifying number

   The Saint Paul Foundation

   THE SAINT PAUL FOUNDATION

   41-6031510

   1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? □ Yes □ 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 □ 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

      Identifying number

   3 If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? □ Yes □ No

      If not, list the name and employer identification number (EIN) of the parent corporation.

   Name of parent corporation

   EIN of parent corporation

   THE COMMUNITY INVESTMENT GROUP

   41-1765364

   3 If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? □ Yes □ No

   If not, list the name and employer identification number (EIN) of the parent corporation.

   Name of parent corporation

   EIN of parent corporation

   THE COMMUNITY INVESTMENT GROUP

   41-1765364

   3 If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? □ Yes □ No

   If not, list the name and employer identification number (EIN) of the parent corporation.

   Name of parent corporation

   EIN of parent corporation

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.

   a. List the name and EIN of the transferor’s partnership.

      Name of partnership

      EIN of partnership

      THE COMMUNITY INVESTMENT GROUP

      41-1765364

   4 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.

       a. List the name and EIN of the transferor’s partnership.

          Name of partnership

          EIN of partnership

          THE COMMUNITY INVESTMENT GROUP

          41-1765364

Part II  Transferee Foreign Corporation Information (see instructions)

4. Name of transferee (foreign corporation)

   AJ LUCAS GROUP LIMITED

   Address (including country)

   1 ELEFTHERIUS PLAZA

   NORTH SYDNEY AS NWS 2060 AUSTRALIA

   Country code of country of incorporation or organization (see instructions)

   AS

   For Paperwork Reduction Act Notice, see separate instructions.
### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
   If "Yes," skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>11/18/19 RECEIVABLE</td>
<td>702</td>
<td>702</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
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<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>702</td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
   Yes ☐ No X

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
   Yes ☐ No X

   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?  
   Yes ☐ No X

   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?  
   Yes ☐ No X

   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 u $  
   Yes ☐ No X

13 Did the transferor transfer property described in section 367(d)(4)?  
   Yes ☐ No X

   If "No," skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
Part IV  Additional Information Regarding Transfer of Property (see instructions)

14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  
\[
\begin{array}{ll}
\text{Yes} & \text{No}
\end{array}
\]

b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  
\[
\begin{array}{ll}
\text{Yes} & \text{No}
\end{array}
\]

c 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?  
\[
\begin{array}{ll}
\text{Yes} & \text{No}
\end{array}
\]

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) $  
\[
\begin{array}{ll}
\text{Yes} & \text{No}
\end{array}
\]

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)?  
\[
\begin{array}{ll}
\text{Yes} & \text{No}
\end{array}
\]

Supplemental Part III Information Required To Be Reported (see instructions)
**Part I  U.S. Transferor Information**

<table>
<thead>
<tr>
<th>Name of transferor</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td>THE SAINT PAUL FOUNDATION</td>
<td>41–6031510</td>
</tr>
</tbody>
</table>

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? ____________________________ ☐ Yes ☑ 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 ☑ 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).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

   If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? ____________________________ ☐ Yes ☑ No

If not, list the name and employer identification number (EIN) of the parent corporation.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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.
   a. List the name and EIN of the transferor's partnership.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

   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 ☑ No
   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**

<table>
<thead>
<tr>
<th>Name of transferee (foreign corporation)</th>
<th>Identifying number, if any</th>
</tr>
</thead>
<tbody>
<tr>
<td>BCPE BREEZE CAYMAN ATSUMI, LLC</td>
<td>41–1765364</td>
</tr>
</tbody>
</table>

6. Address (including country)
   UGLAND HOUSE, SOUTH CHURCH STREET
   GEORGE TOWN CJ KY1-1104 CAYMAN ISLANDS

7. Country code of country of incorporation or organization (see instructions)
   CJ

8. Foreign law characterization (see instructions)
   CORPORATION

9. Is the transferee foreign corporation a controlled foreign corporation? ____________________________ ☐ Yes ☑ No

For Paperwork Reduction Act Notice, see separate instructions.
### Part III — Information Regarding Transfer of Property (see instructions)

#### Section A — Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
If “Yes,” skip the remainder of Part III and go to Part IV.  
Yes [x] No

#### Section B — Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>48</td>
<td>48</td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>48</td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
Yes [x] No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
Yes [x] No

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?  
Yes [x] No

c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?  
Yes [x] No

d Enter the transferred loss amount included in gross income as required under section 91 u $ 

13 Did the transferor transfer property described in section 367(d)(4)?  
Yes [x] No

#### Section C — Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals
14a 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? 
   Yes ☐ No ☒

c 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) u $ ________.

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 ☒

Supplemental Part III Information Required To Be Reported (see instructions)

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 ________%  (b) After ________% ☐ IRC SECTION 351

17 Type of nonrecognition transaction (see instructions) 
   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 
   Yes ☐ No ☒

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 1503(d) 
   d Exchange gain under section 987 
   Yes ☐ No ☒

19 Did this transfer result from a change in entity classification? 
   Yes ☐ No ☒

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. 
   If “Yes,” complete lines 20b and 20c. 
   Yes ☐ No ☒

   b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) u $ ________

   c 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 covered by section 367(e)(1)? See instructions. 
   Yes ☐ No ☒
Form 926
(Rev. November 2018)
Department of the Treasury
Internal Revenue Service

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.

Part I  U.S. Transferor Information (see instructions)

<table>
<thead>
<tr>
<th>Name of transferor</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td>THE SAINT PAUL FOUNDATION</td>
<td>41–6031510</td>
</tr>
</tbody>
</table>

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.
   - 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 [ ] 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).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
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</tr>
</tbody>
</table>

   c. If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? [ ] Yes [ ] No

   If not, list the name and employer identification number (EIN) of the parent corporation.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
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</table>

   d. Have basis adjustments under section 367(a)(4) been made? [ ] Yes [ ] 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.
   - a. List the name and EIN of the transferor's partnership.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td>THE COMMUNITY INVESTMENT GROUP</td>
<td>41–1765364</td>
</tr>
<tr>
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</tr>
</tbody>
</table>

   b. Did the partner pick up its pro rata share of gain on the transfer of partnership assets? [ ] Yes [x] 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 established securities market? [ ] Yes [x] No

Part II  Transferee Foreign Corporation Information (see instructions)

4. Name of transferee (foreign corporation)
   BCPE BREEZE CAYMAN CHITOSE, LLC

5a. Identifying number, if any
   [ ] Yes  [x] No

5b. Reference ID number (see instructions)
   BCPECHITOSE

6. Address (including country)
   UGLAND HOUSE, SOUTH CHURCH STREET
   GEORGE TOWN  CJ KY1–1104 CAYMAN ISLANDS

7. Country code of country of incorporation or organization (see instructions)
   CJ

8. Foreign law characterization (see instructions)
   CORPORATION

9. Is the transferee foreign corporation a controlled foreign corporation? [ ] Yes [x] No

For Paperwork Reduction Act Notice, see separate instructions.

DAA
### Part III - Information Regarding Transfer of Property

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 **Was cash the only property transferred?**

- **Yes** ☐  
- **No** ☑

If "Yes," skip the remainder of Part III and go to Part IV.

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>217</td>
<td>217</td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Property with built-in loss**

**Totals**

11 **Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?**

- **Yes** ☐  
- **No** ☑

12a **Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?**

- **Yes** ☐  
- **No** ☑

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?**

- **Yes** ☐  
- **No** ☑

c **Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?**

- **Yes** ☐  
- **No** ☑

d **Enter the transferred loss amount included in gross income as required under section 91 u $**

- **Yes** ☐  
- **No** ☑

13 **Did the transferor transfer property described in section 367(d)(4)?**

- **Yes** ☐  
- **No** ☑

If "No," skip Section C and questions 14a through 15.

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Totals**

---

Form 926 (Rev. 11-2018)

DAA
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 ______ %  (b) After ______ %

17 Type of nonrecognition transaction (see instructions) u IRC SECTION 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)  Yes X No
   b Gain recognition under section 904(f)(5)(F)  Yes X No
   c 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

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
   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) u $
   c 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 X No

21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation
   covered by section 367(e)(1)? See instructions  Yes X No
# Form 926

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

#### Part I  U.S. Transferor Information (see instructions)

**Name of transferor**

<table>
<thead>
<tr>
<th>THE SAINT PAUL FOUNDATION</th>
<th>41–6031510</th>
</tr>
</thead>
</table>

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? 
   - Yes [ ] No [X]

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 [ ] No [X]
   - b. Did the transferor remain in existence after the transfer? 
     - Yes [ ] No [X]

   If not, list the controlling shareholder(s) and their identifying number(s).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
</table>

3. If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? 
   - Yes [ ] No [ ]

   If not, list the name and employer identification number (EIN) of the parent corporation.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
</table>

4. 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.
   - a. List the name and EIN of the transferor’s partnership.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
</table>

   - b. Did the partner pick up its pro rata share of gain on the transfer of partnership assets? 
     - Yes [ ] No [X]
   - 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 established securities market? 
     - Yes [X] No [ ]

#### Part II  Transferee Foreign Corporation Information (see instructions)

**Name of transferee (foreign corporation)**

<table>
<thead>
<tr>
<th>BCPE BREEZE CAYMAN HIRADOMINAMI, LL</th>
</tr>
</thead>
</table>

5a. Identifying number, if any: 41–1765364

5b. Reference ID number (see instructions):

   - BCPEHIRADOMINAMI

6. Address (including country)

   - UGLAND HOUSE, SOUTH CHURCH STREET
   - GEORGE TOWN CJ KY1–1104 CAYMAN ISLANDS

7. Country code of country of incorporation or organization (see instructions)

   - CJ

8. Foreign law characterization (see instructions)

   - CORPORATION

9. Is the transferee foreign corporation a controlled foreign corporation? 
   - Yes [ ] No [X]

For Paperwork Reduction Act Notice, see separate instructions.
## Part III Information Regarding Transfer of Property (see instructions)

### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
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</tbody>
</table>

10. Was cash the only property transferred?  
   If "Yes," skip the remainder of Part III and go to Part IV.  
   
   [X] Yes  [ ] No

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
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<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19 PARTNERSHIP INTEREST</td>
<td>132</td>
<td>132</td>
<td></td>
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</tr>
<tr>
<td>Other property (not listed under another category)</td>
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<tr>
<td>Property with built-in loss</td>
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<tr>
<td>Totals</td>
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<td>132 132</td>
</tr>
</tbody>
</table>

11. Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
   [X] Yes  [ ] No

12a. Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
   [X] Yes  [ ] No

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," go to line 12b.  
   If "No," go to line 13.  
   [X] Yes  [ ] No

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 12c. If "No," skip lines 12c and 12d, and go to line 13.  
   [X] Yes  [ ] No

d. Enter the transferred loss amount included in gross income as required under section 91 u $ __________________  
   If "No," skip Section C and questions 14a through 15.  
   [X] Yes  [ ] No

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
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<tr>
<td>Totals</td>
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</tbody>
</table>

Form 926 (Rev. 11-2018)
14a 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? .............................................................. Yes  No
c 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

Supplemental Part III Information Required To Be Reported (see instructions)

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 _________ %  (b) After _________ %

17 Type of nonrecognition transaction (see instructions)  IRC SECTION 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)  Yes  No
   b Gain recognition under section 904(f)(5)(F)  Yes  No
   c Recapture under section 1503(d)  Yes  No
   d Exchange gain under section 987  Yes  No

19 Did this transfer result from a change in entity classification?  Yes  No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions  Yes  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) $ ____________________
   c 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 covered by section 367(e)(1)? See instructions  Yes  No
## Part I: U.S. Transferor Information

### Name of transferor

**THE SAINT PAUL FOUNDATION**

Identifying number: 41–6031510

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?</td>
<td>✔</td>
<td>No</td>
</tr>
<tr>
<td>2 If the transferor was a corporation, complete questions 2a through 2d.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>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?</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>b Did the transferor remain in existence after the transfer?</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>If not, list the controlling shareholder(s) and their identifying number(s).</td>
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<td></td>
</tr>
</tbody>
</table>

### Controlling shareholder

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
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</table>

### Name of parent corporation

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
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</table>

### EIN of parent corporation

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<th>EIN of parent corporation</th>
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<tbody>
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</tbody>
</table>

### Name of transferee (foreign corporation)

**THE COMMUNITY INVESTMENT GROUP**

Identifying number: 41–1765364

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Is the transferee foreign corporation a controlled foreign corporation?</td>
<td>✔</td>
<td>No</td>
</tr>
<tr>
<td>2 Did the partner pick up its pro rata share of gain on the transfer of partnership assets?</td>
<td>Yes</td>
<td>✔ No</td>
</tr>
<tr>
<td>c Is the partner disposing of its entire interest in the partnership?</td>
<td>Yes</td>
<td>✔ No</td>
</tr>
<tr>
<td>d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market?</td>
<td>Yes</td>
<td>✔ No</td>
</tr>
</tbody>
</table>

### Name of partner

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
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</tr>
</tbody>
</table>

## Part II: Transferee Foreign Corporation Information

### Name of transferee (foreign corporation)

**BCPE BREEZE CAYMAN HIRONO, LLC**

Identifying number: 41–1765364

### Address (including country)

**UGLAND HOUSE, SOUTH CHURCH STREET**

**GEORGE TOWN**

**CAYMAN ISLANDS**

### Country code of country of incorporation or organization (see instructions)

**CJ**

### Identifying number, if any

<table>
<thead>
<tr>
<th>5a Identifying number</th>
<th>5b Reference ID number</th>
</tr>
</thead>
<tbody>
<tr>
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</table>

### Foreign law characterization (see instructions)

**CORPORATION**

<table>
<thead>
<tr>
<th>Country of incorporation or organization</th>
<th>Foreign law characterization</th>
</tr>
</thead>
<tbody>
<tr>
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</table>

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For Paperwork Reduction Act Notice, see separate instructions.
### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
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<th>(d) Cost or other basis</th>
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<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? [ ] Yes [X] No

If "Yes," skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
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<tr>
<td>Inventory</td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>239</td>
<td>239</td>
<td></td>
</tr>
<tr>
<td>Other property</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>(not listed under another category)</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
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</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [X] No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? [ ] Yes [X] No

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? [ ] Yes [X] No

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? [ ] Yes [X] No

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 u $ ________________

13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [X] No

If "No," skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

---

Form 926 (Rev. 11-2018)
14a  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?  

Yes  No

c  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

Supplemental Part III Information Required To Be Reported (see instructions)

16a  Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.

(a) Before %  (b) After %

17  Type of nonrecognition transaction (see instructions)  

IRC SECTION 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)  

Yes  No

b  Gain recognition under section 904(f)(5)(F)  

Yes  No

c  Recapture under section 1503(d)  

Yes  No

d  Exchange gain under section 987  

Yes  No

19  Did this transfer result from a change in entity classification?  

Yes  No

20a  Did a domestic corporation make a distribution of property covered by section 367(e)(2)?  See instructions  

Yes  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) $  

$c  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 covered by section 367(e)(1)?  See instructions  

Yes  No

Form 926 (Rev. 11-2018)
Form 926

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

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? □ Yes □ 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 □ No
   b. Did the transferor remain in existence after the transfer? □ Yes □ No

3. If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? □ Yes □ No
   If not, list the name and employer identification number (EIN) of the parent corporation.

4. If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), list the name and EIN of the transferor's partnership.

5. a. Have basis adjustments under section 367(a)(4) been made? □ Yes □ No

Part II Transferee Foreign Corporation Information (see instructions)

6. a. Name of transferee (foreign corporation)
   BCPE BREEZE CAYMAN NOHEJI, LLC
   Address (including country)
   UGLAND HOUSE, SOUTH CHURCH STREET
   GEORGE TOWN CJ KY1-1104 CAYMAN ISLANDS

7. Country code of country of incorporation or organization (see instructions)
   CJ

8. Foreign law characterization (see instructions)
   CORPORATION

9. Is the transferee foreign corporation a controlled foreign corporation? □ Yes □ No
**Part III Information Regarding Transfer of Property (see instructions)**

### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 **Was cash the only property transferred?**

If "Yes," skip the remainder of Part III and go to Part IV.

- Yes [X] No

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td>03/31/19 PARTNERSHIP INTEREST</td>
<td>529</td>
<td>529</td>
<td></td>
</tr>
</tbody>
</table>

Other property (not listed under another category)

Property with built-in loss

Totals

- 529

11 **Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?**

- Yes [X] No

12a **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.

- Yes [X] No

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.

- Yes [X] No

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.

- Yes [X] No

d **Enter the transferred loss amount included in gross income as required under section 91 u $**

- Yes [X] No

13 **Did the transferor transfer property described in section 367(d)(4)?**

If "No," skip Section C and questions 14a through 15.

**Section C—Intangible Property Subject to Section 367(d)**

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals
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 _________ %  (b) After _________ %   IRC SECTION 351

17  Type of nonrecognition transaction (see instructions)  
    a  Gain recognition under section 904(f)(3)               Yes  X  No
    b  Gain recognition under section 904(f)(5)(F)           Yes  X  No
    c  Recapture under section 1503(d)                      Yes  X  No
    d  Exchange gain under section 987                      Yes  X  No

18  Indicate whether any transfer reported in Part III is subject to any of the following.
    a  Gain recognition under section 904(f)(3)               Yes  X  No
    b  Gain recognition under section 904(f)(5)(F)           Yes  X  No
    c  Recapture under section 1503(d)                      Yes  X  No
    d  Exchange gain under section 987                      Yes  X  No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)?  See instructions
    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)  $ __________
    c  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  X  No

21  Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)?  See instructions
Form 926
(Rev. November 2018)
Department of the Treasury
Internal Revenue Service

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.

Part I  U.S. Transferor Information (see instructions)

Name of transferor: THE SAINT PAUL FOUNDATION
Identifying number: 41-6031510

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? [ ] Yes [x] No
2. If the transferee 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 [ ] 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: 
Identifying number: 

   c. If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? [ ] Yes [ ] No
      If not, list the name and employer identification number (EIN) of the parent corporation.

   Name of parent corporation: 
   EIN of parent corporation: 

   d. Have basis adjustments under section 367(a)(4) been made? [ ] Yes [ ] 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.
   a. List the name and EIN of the transferor’s partnership.
      Name of partnership: 
      EIN of partnership: 

Part II  Transferee Foreign Corporation Information (see instructions)

4. Name of transferee (foreign corporation): BCPE BREEZE CAYMAN SANMORI, LLC

5a. Identifying number, if any: 41-1765364
5b. Reference ID number (see instructions): BCPESANMORI

6. Address (including country):
   UGLAND HOUSE, SOUTH CHURCH STREET
   GEORGE TOWN CAYMAN ISLANDS

7. Country code of country of incorporation or organization (see instructions): CJ

8. Foreign law characterization (see instructions):
   CORPORATION

9. Is the transferee foreign corporation a controlled foreign corporation? [ ] Yes [x] No

For Paperwork Reduction Act Notice, see separate instructions.
DAA
**Part III Information Regarding Transfer of Property**

### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? 

If “Yes,” skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>194</td>
<td>194</td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>194</td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? 

12a 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 u.$

13 Did the transferor transfer property described in section 367(d)(4)?

If “No,” skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm’s length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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Form 926 (Rev. 11-2018)
**14a** Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years? 

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

**b** At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

**c** 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?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

**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) u $ 

**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)?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

### Supplemental Part III Information Required To Be Reported (see instructions)

---

### 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 ________ %  (b) After ________ %

**17** Type of nonrecognition transaction (see instructions) u **IRC SECTION 351**

**18** Indicate whether any transfer reported in Part III is subject to any of the following.

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>a</td>
<td>Gain recognition under section 904(f)(3)</td>
</tr>
<tr>
<td>b</td>
<td>Gain recognition under section 904(f)(5)(F)</td>
</tr>
<tr>
<td>c</td>
<td>Recapture under section 1503(d)</td>
</tr>
<tr>
<td>d</td>
<td>Exchange gain under section 987</td>
</tr>
</tbody>
</table>

**19** Did this transfer result from a change in entity classification?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

**20a** Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

If “Yes,” complete lines 20b and 20c.

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>b</td>
<td>Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) u $</td>
</tr>
</tbody>
</table>

**21** Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>
Form 926

Department of the Treasury
Internal Revenue Service

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

(Rev. November 2018)

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? □ Yes □ 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 □ 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   Identifying number

   Name of transferee (foreign corporation)

   transferee Foreign Corporation Information (see instructions)

   Name of transferee (foreign corporation)

   THE COMMUNITY INVESTMENT GROUP

   41–1765364

   6. Address (including country)

   UGLAND HOUSE, SOUTH CHURCH STREET

   GEORGE TOWN   CJ KY1–1104   CAYMAN ISLANDS

   7. Country code of country of incorporation or organization (see instructions)

   CJ

   8. Foreign law characterization (see instructions)

   CORPORATION

   Identifying number, if any

   Name of transferee (foreign corporation)

   THE SAINT PAUL FOUNDATION

   41–6031510

   EIN of parent corporation

   THE COMMUNITY INVESTMENT GROUP

   41–1765364

   EIN of partnership

   The SAINT PAUL FOUNDATION

   41–6031510

   BCPE BREEZE CAYMAN TANOHATA, LLC

   41–1765364

   5b Reference ID number (see instructions)

   BCPETANOHATA

   8. Foreign law characterization (see instructions)

   CORPORATION

   Country code of country of incorporation or organization (see instructions)

   CJ

   The SAINT PAUL FOUNDATION

   41–6031510

   THE COMMUNITY INVESTMENT GROUP

   41–1765364

   EIN of parent corporation

   THE COMMUNITY INVESTMENT GROUP

   41–1765364

   the name and employer identification number (EIN) of the parent corporation.

   Name of parent corporation

   EIN of parent corporation

   THE COMMUNITY INVESTMENT GROUP

   41–1765364

   EIN of partnership

   THE COMMUNITY INVESTMENT GROUP

   41–1765364

   All transferees must complete all sections of Form 926 or a blank Form 926. Form 926 must be signed and dated by the transferee foreign corporation, or its agent, if any. For Paperwork Reduction Act Notice, see separate instructions.
**Part III**  
Information Regarding Transfer of Property (see instructions)

### Section A—Cash

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
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<th>(d) Fair market value on date of transfer</th>
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<td></td>
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<td></td>
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10 **Was cash the only property transferred?**

If “Yes,” skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
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<tr>
<th>(a) Type of property</th>
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<tr>
<td>Inventory</td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>65</td>
<td>65</td>
<td></td>
</tr>
<tr>
<td>Other property</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
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<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

11 **Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?**

12a **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.

12b **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.

12c **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.

12d **Enter the transferred loss amount included in gross income as required under section 91 u $**

13 **Did the transferor transfer property described in section 367(d)(4)?**

If “No,” skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
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<tr>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals
## Part IV  Additional Information Regarding Transfer of Property (see instructions)

### 14a 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 □

### 14b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?
- Yes □
- No □

### 14c 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 □

### 14d 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) u $

### 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 □

---

### Supplemental Part III Information Required To Be Reported (see instructions)

---

### 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 ________%  (b) After ________%

#### 17 Type of nonrecognition transaction (see instructions) u IRC SECTION 351

#### 18 Indicate whether any transfer reported in Part III is subject to any of the following.

- Gain recognition under section 904(f)(3) Yes □ No □
- Gain recognition under section 904(f)(5)(F) Yes □ No □
- Recapture under section 1503(d) Yes □ No □
- Exchange gain under section 987 Yes □ No □

#### 19 Did this transfer result from a change in entity classification?
- Yes □
- No □

#### 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
- Yes □
- No □

If “Yes,” complete lines 20b and 20c.

#### 20b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) u $

#### 20c 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 covered by section 367(e)(1)? See instructions
- Yes □
- No □
Form 926
Return by a U.S. Transferor to a Foreign Corporation

Part I  U.S. Transferor Information (see instructions)
Name of transferor
THE SAINT PAUL FOUNDATION
Identifying number (see instructions)
41-6031510

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? ☑ 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? ☑ No
   b Did the transferor remain in existence after the transfer? ☑ No
   If not, list the controlling shareholder(s) and their identifying number(s).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

   c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? ☑ No
   If not, list the name and employer identification number (EIN) of the parent corporation.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

   d Have basis adjustments under section 367(a)(4) been made? ☑ 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.
   a List the name and EIN of the transferor's partnership.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Part II  Transferee Foreign Corporation Information (see instructions)

4 Name of transferee (foreign corporation)
BCPE BREEZE CAYMAN TSUKIKOSHIGENYA

5a Identifying number, if any

5b Reference ID number (see instructions)
BCPETSUKIKOSHIGENYA

6 Address (including country)
UGLAND HOUSE, SOUTH CHURCH STREET
GEORGE TOWN CJ KY1-1104 CAYMAN ISLANDS

7 Country code of country of incorporation or organization (see instructions)
CJ

8 Foreign law characterization (see instructions)
CORPORATION

9 Is the transferee foreign corporation a controlled foreign corporation? ☑ No

For Paperwork Reduction Act Notice, see separate instructions.
DAA
### Part III: Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
If "Yes," skip the remainder of Part III and go to Part IV.  

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>301</td>
<td>301</td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Property with built-in loss | | | | | |

Totals  

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
If "Yes," go to line 12b.  

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.  

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 911  

13 Did the transferor transfer property described in section 367(d)(4)?  
If "No," skip Section C and questions 14a through 15.  

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals  

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Form 926 (Rev. 11-2018)
Part IV  Additional Information Regarding Transfer of Property (see instructions)

14a  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? ................................................................. Yes  No  

  c  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) u  $ .................................................................

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

Supplemental Part III Information Required To Be Reported (see instructions)

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 ___%  (b) After ___%  

17  Type of nonrecognition transaction (see instructions) u IRC SECTION 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) ................................................................. Yes  X  No

  b  Gain recognition under section 904(f)(5)(F) ................................................................. Yes  X  No

  c  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

20a  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

  a  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) u  $ .................................................................

  c  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 covered by section 367(e)(1)? See instructions ................................................................. Yes  X  No
Form 926
(Rev. November 2018)
Department of the Treasury
Internal Revenue Service

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

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? 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? No
   b Did the transferor remain in existence after the transfer? No

Controlling shareholder

Identifying number

Name of parent corporation

EIN of parent corporation

3 What is the transferee foreign corporation a controlled foreign corporation? No

Name of transferee (foreign corporation)

Transferee Foreign Corporation Information (see instructions)

4 Name of transferee (foreign corporation)

BCPE BREEZE CAYMAN UKUJIMA, LLC

5a Identifying number, if any

5b Reference ID number (see instructions)

Address (including country)

UGLAND HOUSE, SOUTH CHURCH STREET

GEORGE TOWN  CJ KY1–1104  CAYMAN ISLANDS

Country code of country of incorporation or organization (see instructions)

CJ

Foreign law characterization (see instructions)

CAYMAN CORPORATION

For Paperwork Reduction Act Notice, see separate instructions.

DAA
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
<th>(c) Description of property</th>
<th>(d) Fair market value on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
If “Yes,” skip the remainder of Part III and go to Part IV.

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
<th>(c) Description of property</th>
<th>(d) Fair market value on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>518</td>
<td>518</td>
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</tr>
<tr>
<td>Other property</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>(not listed under another category)</td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>518</td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  

12a 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.

12b 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.

12c 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.

12d Enter the transferred loss amount included in gross income as required under section 91 u $  

13 Did the transferor transfer property described in section 367(d)(4)?  
If “No,” skip Section C and questions 14a through 15.

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
<th>(c) Description of property</th>
<th>(d) Useful life</th>
<th>(e) Arm’s length price on date of transfer</th>
<th>(f) Cost or other basis</th>
<th>(g) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
14a. Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  
14b. At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  
14c. 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?  
14d. 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)?  

Supplemental Part III Information Required To Be Reported (see instructions)

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 _______ %  (b) After _______ %  
17. Type of nonrecognition transaction (see instructions) IRC SECTION 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 1503(d)  
   d. Exchange gain under section 987  
19. Did this transfer result from a change in entity classification?  
20a. Did a domestic corporation make a distribution of property covered by section 367(e)(2)?  
   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) $ .  
   c. 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)?  
21. Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)?  
   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) $ .  
   c. 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)?  

Form 926 (Rev. 11-2018)
Form 926
(Rev. November 2018)
Department of the Treasury
Internal Revenue Service

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
Attachment
Sequence No. 128

Part I  U.S. Transferor Information (see instructions)

Name of transferor

THE SAINT PAUL FOUNDATION

Identifying number

41–6031510

1  Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? □ Yes □ 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 □ 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).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

   c  If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? □ Yes □ No

If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation

THE COMMUNITY INVESTMENT GROUP

EIN of parent corporation

41–1765364

   d  Have basis adjustments under section 367(a)(4) been made? □ Yes □ 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.

   a  List the name and EIN of the transferor’s partnership.

Name of partnership

BCPE BREEZE CAYMAN YOKOHAMA, LLC

EIN of partnership

41–6031510

   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 □ No

   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)

BCPE BREEZE CAYMAN YOKOHAMA, LLC

5a Identifying number, if any

5b Reference ID number (see instructions)

UGLAND HOUSE, SOUTH CHURCH STREET

GEORGE TOWN  CJ KY1–1104  CAYMAN ISLANDS

6  Address (including country)

BCPEYOKOHAMA

7  Country code of country of incorporation or organization (see instructions)

CJ

8  Foreign law characterization (see instructions)

CORPORATION

9  Is the transferee foreign corporation a controlled foreign corporation? □ Yes □ No

For Paperwork Reduction Act Notice, see separate instructions.

DAA
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
If “Yes,” skip the remainder of Part III and go to Part IV.  
☐ Yes  X No

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>1,218</td>
<td>1,218</td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Property with built-in loss |                      |                            |                                        |                        |                                |

Totals 1,218 1,218

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
☐ Yes  X No

12a 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.  
☐ Yes  X No

d 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.  
☐ Yes  X No

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.  
☐ Yes  X No

d Enter the transferred loss amount included in gross income as required under section 91 u $  
13 Did the transferor transfer property described in section 367(d)(4)?  
If “No,” skip Section C and questions 14a through 15.  
☐ Yes  X No

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals  

Form 926 (Rev. 11-2018)
14a  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?  ☐ Yes ☐ No

c  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) u $ ________.

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

Supplemental Part III Information Required To Be Reported (see instructions)

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 _______%  (b) After _______%

17  Type of nonrecognition transaction (see instructions) u IRC SECTION 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)  ☐ Yes ☒ No

   b  Gain recognition under section 904(f)(5)(F)  ☐ Yes ☒ No

   c  Recapture under section 1503(d)  ☐ Yes ☒ No

   d  Exchange gain under section 987  ☐ Yes ☒ No

19  Did this transfer result from a change in entity classification?  ☐ Yes ☒ No

20a  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

   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) u $ __________

   c  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 covered by section 367(e)(1)? See instructions  ☐ Yes ☒ No
Return by a U.S. Transferor of Property to a Foreign Corporation

Part I

U.S. Transferor Information (see instructions)

Name of transferor

THE SAINT PAUL FOUNDATION

41–6031510

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? □ Yes □ No

2. If the transferee 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 □ 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

   Identifying number

   Name of parent corporation

   EIN of parent corporation

   c. If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? □ Yes □ No

   If not, list the name and employer identification number (EIN) of the parent corporation.

   Name of parent corporation

   EIN of parent corporation

   d. Have basis adjustments under section 367(a)(4) been made? □ Yes □ 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.
   a. List the name and EIN of the transferor's partnership.

   Name of partnership

   EIN of partnership

   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 □ No

   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)

   CANBRIDGE PHARMACEUTICALS INC.

   5a. Identifying number, if any

   5b. Reference ID number

   6. Address (including country)

   FLAT 303A, 106 LI ZE ZHONG BEIJING CH CHINA, PEOPLES REPUB

   7. Country code of country of incorporation or organization (see instructions)

   CJ

   8. Foreign law characterization (see instructions)

   CORPORATION

   9. Is the transferee foreign corporation a controlled foreign corporation? □ Yes □ No

For Paperwork Reduction Act Notice, see separate instructions.
### Section A—Cash

<table>
<thead>
<tr>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
- Yes ☐  No ☒

If “Yes,” skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>08/23/18 STOCK</td>
<td>11</td>
<td>11</td>
<td></td>
</tr>
</tbody>
</table>

Other property  
- Inventory
- (not listed under another category)
- Property with built-in loss

| Totals | 11 | 11 |

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm’s length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Totals |                          |                 |                                          |                        |                                                          |

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
- Yes ☐  No ☒

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
- Yes ☐  No ☒

If “Yes,” continue 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?  
- Yes ☐  No ☐

If “Yes,” continue to line 12c.

If “No,” go to line 12d.

If “Yes,” skip lines 12c and 12d, and go to line 13.

12c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?  
- Yes ☐  No ☒

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 911 u $ ________  
- Yes ☐  No ☒

If “No,” skip Section C and questions 14a through 15.
Additional Information Regarding Transfer of Property (see instructions)

Part IV

14a 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? Yes ☐ No ☐

c 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 ☐

Supplemental Part III Information Required To Be Reported (see instructions)

Part IV

16 Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.

(a) Before ______ % (b) After ______ %

17 Type of nonrecognition transaction (see instructions) IRC SECTION 351

18 Indicate whether any transfer reported in Part III is subject to any of the following.

- Gain recognition under section 904(f)(3) Yes ☐ No ☐
- Gain recognition under section 904(f)(5)(F) Yes ☐ No ☐
- Recapture under section 1503(d) Yes ☐ No ☐
- Exchange gain under section 987 Yes ☐ No ☐

19 Did this transfer result from a change in entity classification? Yes ☐ No ☐

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

- 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) $ ___________.

- c 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 covered by section 367(e)(1)? See instructions

- Yes ☐ No ☐

Form 926 (Rev. 11-2018)
Form 926
(Rев. November 2018)
Department of the Treasury
Internal Revenue Service

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.

Part I  U.S. Transferor Information (see instructions)

<table>
<thead>
<tr>
<th>Name of transferor</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td>THE SAINT PAUL FOUNDATION</td>
<td>41–6031510</td>
</tr>
</tbody>
</table>

1  Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? Yes ☑ 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 ☑ 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).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
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<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

   c  If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? Yes ☑ No
      If not, list the name and employer identification number (EIN) of the parent corporation.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<tr>
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<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

   d  Have basis adjustments under section 367(a)(4) been made? Yes ☑ 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.
   a  List the name and EIN of the transferor's partnership.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Part II  Transferee Foreign Corporation Information (see instructions)

4  Name of transferee (foreign corporation) CBC KETO PUMPS SARL

5a  Identifying number, if any

6  Address (including country)
    37, RUE D’ANVERS
    LUXEMBOURG L-1130 LUXEMBOURG

5b  Reference ID number (see instructions)
    CBCKETO

7  Country code of country of incorporation or organization (see instructions)
    LU

8  Foreign law characterization (see instructions) CORPORATION

9  Is the transferee foreign corporation a controlled foreign corporation? Yes ☑ No

For Paperwork Reduction Act Notice, see separate instructions.

Form 926 (Rev. 11-2018)
### Part III Information Regarding Transfer of Property (see instructions)

**Section A—Cash**

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
If "Yes," skip the remainder of Part III and go to Part IV.  

**Section B—Other Property (other than intangible property subject to section 367(d))**

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td>FOREIGN CURRENCY–GBP</td>
<td>3</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals  

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
Yes  
No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
Yes  
No

**Section C—Intangible Property Subject to Section 367(d)**

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

13 Did the transferor transfer property described in section 367(d)(4)?  
Yes  
No

---

Form 926 (Rev. 11-2018)

THE SAINT PAUL FOUNDATION 41–6031510

Page 2
Part IV  Additional Information Regarding Transfer of Property (see instructions)

14a  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

14b  At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  

   Yes  No

14c  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

14d  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) u $ .

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

Supplemental Part III Information Required To Be Reported (see instructions)

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 % (b) After %

17  Type of nonrecognition transaction (see instructions) u IRC SECTION 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)  

   Yes  No

   b  Gain recognition under section 904(f)(5)(F)  

   Yes  No

   c  Recapture under section 1503(d)  

   Yes  No

   d  Exchange gain under section 987  

   Yes  No

19  Did this transfer result from a change in entity classification?  

   Yes  No

20a  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions.

   Yes  No

b  Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) u $  

20c  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 covered by section 367(e)(1)? See instructions  

   Yes  X  No
Form 926
Return by a U.S. Transferor of Property
to a Foreign Corporation

Part I  U.S. Transferor Information (see instructions)

THE SAINT PAUL FOUNDATION

Name of transferor

Identifying number
41–6031510

1  Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  ☑ 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 transferee controlled (under section 368(c)) by five or fewer domestic corporations?  ☑ No

   b  Did the transferee remain in existence after the transfer?  ☑ No

   If not, list the controlling shareholder(s) and their identifying number(s).

   Controlling shareholder

   Identifying number

   Name of parent corporation

   EIN of parent corporation

   No

3  If the transferee was a member of an affiliated group filing a consolidated return, was it the parent corporation?  ☑ No

   If not, list the name and employer identification number (EIN) of the parent corporation.

   Name of parent corporation

   EIN of parent corporation

   No

4  Have basis adjustments under section 367(a)(4) been made?  ☑ No

Part II  Transferee Foreign Corporation Information (see instructions)

THE COMMUNITY INVESTMENT GROUP

Name of transferee (foreign corporation)
CLOVERDELL INVESTMENT LTD

Identifying number
41–1765364

5a  Identifying number, if any
5b  Reference ID number

Address (including country)
8TH FLOOR, NEWTON TOWER
PORT LOUIS  MP  MAURITIUS

6  Country code of country of incorporation or organization (see instructions)

7  Foreign law characterization (see instructions)

8  Is the transferee foreign corporation a controlled foreign corporation?  ☑ Yes

For Paperwork Reduction Act Notice, see separate instructions.
### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? [ ] Yes [x] No

If "Yes," skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>07/12/19</td>
<td>STOCKS &amp; SECURITIES</td>
<td>531</td>
<td>531</td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

531

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Questions

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [x] No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? [ ] Yes [x] No

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? [ ] Yes [x] No

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? [ ] Yes [x] No

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 911: $ [x] No

13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [x] No

If "No," skip Section C and questions 14a through 15.

DAA
14a 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? ☐ Yes ☐ No
c 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

Supplemental Part III Information Required To Be Reported (see instructions)

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 __________ % (b) After __________ %

17 Type of nonrecognition transaction (see instructions) IRC SECTION 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) ☐ Yes ☐ No
   b Gain recognition under section 904(f)(5)(F) ☐ Yes ☐ No
   c Recapture under section 1503(d) ☐ Yes ☐ No
   d Exchange gain under section 987 ☐ Yes ☐ No

19 Did this transfer result from a change in entity classification? ☐ Yes ☐ No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions ☐ Yes ☐ 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) $ _______________.
   c 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 covered by section 367(e)(1)? See instructions ☐ Yes ☐ No

Form 926 (Rev. 11-2018)
**Part I  U.S. Transferor Information (see instructions)**

**Name of transferor:**

**THE SAINT PAUL FOUNDATION**

- **Identifying number:** 41-6031510

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? □ Yes □ 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 □ 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).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<tr>
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</tr>
</tbody>
</table>

   c. If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? □ Yes □ No
      If not, list the name and employer identification number (EIN) of the parent corporation.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
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<td></td>
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<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

   d. Have basis adjustments under section 367(a)(4) been made? □ Yes □ 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.
   - a. List the name and EIN of the transferor’s partnership.

       **Name of partnership:**
       **EIN of partnership:** 41-1765364

   - 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 □ No
   - 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):**
   **EXCELLENCE LOGGING GURNSEY CO LTD**
   **EIN:** 41-6031510

5a. **Identifying number, if any**

6. **Address (including country):**
   **EAST WING, TRAFALGAR COURT**
   **ST PETER PORT, GY1 3PP, GUERNSEY**

7. **Country code of country of incorporation or organization (see instructions):**
   **GK**

8. **Foreign law characterization (see instructions):**
   **CORPORATION**

9. Is the transferee foreign corporation a controlled foreign corporation? □ Yes □ No
**Part III Information Regarding Transfer of Property (see instructions)**

### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? [ ] Yes [x] No

If “Yes,” skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>04/27/18</td>
<td>STOCK &amp; SECURITIES</td>
<td>14,441</td>
<td>14,441</td>
<td></td>
</tr>
</tbody>
</table>

Inventory

Other property (not listed under another category)

Property with built-in loss

Totals 14,441 14,441

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [x] No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? [ ] Yes [x] No

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? [ ] Yes [x] No

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? [ ] Yes [x] No

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 u $ _______________

13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [x] No

If "No," skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

Form 926 (Rev. 11-2018)
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 % (b) After %

17  Type of nonrecognition transaction (see instructions)  
    IRC SECTION 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 1503(d)  
   d  Exchange gain under section 987  

19  Did this transfer result from a change in entity classification?  

20a  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions.
   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) u $  
   c  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)?  

21  Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions.
Part I  U.S. Transferor Information  (see instructions)  

Name of transferor  

THE SAINT PAUL FOUNDATION  

Identifying number  

41–6031510  

1  Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  

☐ Yes ☑ 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 ☑ 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  

Identifying number  

EIN of parent corporation  

Name of parent corporation  

c  If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?  

☐ Yes ☑ No  

If not, list the name and employer identification number (EIN) of the parent corporation.  

Name of parent corporation  

EIN of parent corporation  

d  Have basis adjustments under section 367(a)(4) been made?  

☐ Yes ☑ 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.  

a  List the name and EIN of the transferor's partnership.  

Name of partnership  

EIN of partnership  

THE COMMUNITY INVESTMENT GROUP  

41–1765364  

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 ☑ No  

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)  

FORGE OIL & GAS LIMITED  

5a  Identifying number, if any  

5b  Reference ID number  

Address (including country)  

2200, 840–7TH AVENUE SW  

ALBERTA  

CALGARY  

CA  

T2P 3G2  

CANADA  

FORGE  

Country code of country of incorporation or organization (see instructions)  

CA  

Foreign law characterization (see instructions)  

CORPORATION  

9  Is the transferee foreign corporation a controlled foreign corporation?  

☐ Yes ☑ No  

Go to www.irs.gov/Form926 for instructions and the latest information.
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 

Was cash the only property transferred?  

[ ] Yes [x] No  

If "Yes," skip the remainder of Part III and go to Part IV.

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>FOREIGN CURRENCY - CAD</td>
<td>204</td>
<td>204</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>204</td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  

[ ] Yes [x] No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  

[ ] Yes [x] No

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 12b.  

[ ] Yes [ ] No

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 12c. If "No," skip lines 12c and 12d, and go to line 13.  

[ ] Yes [ ] No

d Enter the transferred loss amount included in gross income as required under section 91 u $  

[ ] Yes [x] No

13 Did the transferor transfer property described in section 367(d)(4)?  

If "No," skip Section C and questions 14a through 15.  

[ ] Yes [x] No

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
Additional Information Regarding Transfer of Property

14a 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? Yes No

c 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

Supplemental Part III Information Required To Be Reported (see instructions)

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 ________ %  (b) After ________ %

17 Type of nonrecognition transaction (see instructions) U IRC SECTION 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)  Yes No

b Gain recognition under section 904(f)(5)(F)  Yes No

c Recapture under section 1503(d)  Yes No

d Exchange gain under section 987  Yes No

19 Did this transfer result from a change in entity classification? Yes No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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) $.

c 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 covered by section 367(e)(1)? See instructions Yes No
## Part I  U.S. Transferor Information (see instructions)

**Name of transferor**

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### THE SAINT PAUL FOUNDATION

41–6031510

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.
   
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 [ ] 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).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### c. If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? [ ] Yes [ ] No

If not, list the name and employer identification number (EIN) of the parent corporation.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### d. Have basis adjustments under section 367(a)(4) been made? [ ] Yes [ ] 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.

   a. List the name and EIN of the transferor’s partnership.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

## Part II  Transferee Foreign Corporation Information (see instructions)

### 4. Name of transferee (foreign corporation)

**HPT FUNDO DE INVESTIMENTO EM**

5a Identifying number, if any

<table>
<thead>
<tr>
<th>98–1238227</th>
</tr>
</thead>
</table>

### 6. Address (including country)

1001 PENNSYLVANIA AVE NW, STE 220 DC

### 7. Country code of country of incorporation or organization (see instructions)

**BR**

### 8. Foreign law characterization (see instructions)

**CORPORATION**

### 9. Is the transferee foreign corporation a controlled foreign corporation? [ ] Yes [x] No

For Paperwork Reduction Act Notice, see separate instructions.
### Part III - Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**10.** Was cash the only property transferred?  
☐ Yes  ☒ No

If "Yes," skip the remainder of Part III and go to Part IV.

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>02/27/18 STOCK</td>
<td>6</td>
<td>6</td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td>6</td>
<td>6</td>
<td></td>
</tr>
</tbody>
</table>

**11.** Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
☐ Yes  ☒ No

**12a.** Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
☐ Yes  ☒ No

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?  
☐ Yes  ☒ No

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?  
☐ Yes  ☒ No

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 u $ ________________  
☐ Yes  ☒ No

If "No," skip Section C and questions 14a through 15.

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
### Part IV  Additional Information Regarding Transfer of Property (see instructions)

<table>
<thead>
<tr>
<th>14a</th>
<th>Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>14b</td>
<td>At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>14c</td>
<td>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?</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>14d</td>
<td>If the answer to line 14c is &quot;Yes,&quot; 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) u $</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### Supplemental Part III Information Required To Be Reported (see instructions)

- Enter the transferor's interest in the transferee foreign corporation before and after the transfer.
<table>
<thead>
<tr>
<th>(a) Before</th>
<th>(b) After</th>
</tr>
</thead>
</table>

#### IRC SECTION 351

<table>
<thead>
<tr>
<th>17</th>
<th>Type of nonrecognition transaction (see instructions)</th>
<th>IRC SECTION 351</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>18</th>
<th>Indicate whether any transfer reported in Part III is subject to any of the following.</th>
</tr>
</thead>
<tbody>
<tr>
<td>a</td>
<td>Gain recognition under section 904(f)(3)</td>
</tr>
<tr>
<td>b</td>
<td>Gain recognition under section 904(f)(5)(F)</td>
</tr>
<tr>
<td>c</td>
<td>Recapture under section 1503(d)</td>
</tr>
<tr>
<td>d</td>
<td>Exchange gain under section 987</td>
</tr>
</tbody>
</table>

| 19 | Did this transfer result from a change in entity classification? | Yes| No |

<table>
<thead>
<tr>
<th>20a</th>
<th>Did a domestic corporation make a distribution of property covered by section 367(e)(2)?</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>b</td>
<td>Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) u $</td>
<td></td>
<td></td>
</tr>
<tr>
<td>c</td>
<td>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)?</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

| 21 | Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? | Yes| No |

Form 926 (Rev. 11-2018)
**Form 926**

**Title:** Return by a U.S. Transferor of Property to a Foreign Corporation

**Purpose:** Attach to your income tax return for the year of the transfer or distribution.

### Part I  U.S. Transferor Information (see instructions)

<table>
<thead>
<tr>
<th>Name of transferor</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td>THE SAINT PAUL FOUNDATION</td>
<td>41–6031510</td>
</tr>
</tbody>
</table>

1. **Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?**
   - Yes [ ] No [x]

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 [ ] 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).  

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
</table>

3. **c. If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?**
   - Yes [ ] No [ ]
   - If not, list the name and employer identification number (EIN) of the parent corporation.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
</table>

4. **d. Have basis adjustments under section 367(a)(4) been made?**
   - Yes [ ] No [ ]

5. **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.**
   - a. **List the name and EIN of the transferor’s partnership.**

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
</table>

| THE COMMUNITY INVESTMENT GROUP | 41–1765364 |

b. **Did the partner pick up its pro rata share of gain on the transfer of partnership assets?**
   - Yes [ ] No [x]

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 established securities market?**
   - Yes [ ] No [x]

### Part II Transferee Foreign Corporation Information (see instructions)

<table>
<thead>
<tr>
<th>Name of transferee (foreign corporation)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>MELTWATER HOLDING B.V.</td>
<td></td>
</tr>
</tbody>
</table>

5a. **Identifying number, if any**

6. **Address (including country)**
   - SINGEL 251  
   - AMSTERDAM NL 1016AB NETHERLANDS  
   - MELTWATER CORPORATION

5b. **Reference ID number (see instructions)**

7. **Country code of country of incorporation or organization (see instructions)**
   - NL

8. **Foreign law characterization (see instructions)**

9. **Is the transferee foreign corporation a controlled foreign corporation?**
   - Yes [ ] No [x]
### Part III — Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
Yes [X] No  
If "Yes," skip the remainder of Part III and go to Part IV.

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/01/19 LOAN/ACCRUED INTEREST</td>
<td>149</td>
<td>149</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td>149</td>
<td>149</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
Yes [X] No  
12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
Yes [X] No  
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?  
Yes [X] No  
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?  
Yes [X] No  
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 911  
$ |

13 Did the transferor transfer property described in section 367(d)(4)?  
Yes [X] No  
If "No," skip Section C and questions 14a through 15.

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
14a 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?  
   Yes  No

c 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

Supplemental Part III Information Required To Be Reported (see instructions)

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 ________ %  (b) After ________ %

17 Type of nonrecognition transaction (see instructions)  
   IRC SECTION 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)  
      Yes  No
   b Gain recognition under section 904(f)(5)(F)  
      Yes  No
   c Recapture under section 1503(d)  
      Yes  No
   d Exchange gain under section 987  
      Yes  No

19 Did this transfer result from a change in entity classification?  
   Yes  No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions  
   Yes  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)  
      $ __________

   c 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 covered by section 367(e)(1)? See instructions  
   Yes  No

Form 926 (Rev. 11-2018)
**Form 926**

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

**Part I U.S. Transferor Information** (see instructions)

Name of transferor: **THE SAINT PAUL FOUNDATION**

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Is the transferee a specified 10%-owned foreign corporation?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2 If the transferor was a corporation, complete questions 2a through 2d.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>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?</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>b Did the transferee remain in existence after the transfer?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>If not, list the controlling shareholder(s) and their identifying number(s).</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<td></td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?

If not, list the name and employer identification number (EIN) of the parent corporation.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Question</th>
<th>Year of transfer or distribution</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Name of transferee (foreign corporation): **THE COMMUNITY INVESTMENT GROUP**

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>4 If the transferee 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.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>a List the name and EIN of the transferor's partnership.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
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</tr>
</tbody>
</table>

**Part II Transferee Foreign Corporation Information** (see instructions)

Name of transferee (foreign corporation): **MONT BLANC BRANDS HOLDINGS S.A.R.L.**

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>5a Identifying number, if any</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5b Reference ID number (see instructions)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Address (including country)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>6 7 RUE LOU HEMMER</td>
<td>LU L-1748</td>
</tr>
<tr>
<td>LUXEMBOURG</td>
<td>LUXEMBOURG</td>
</tr>
<tr>
<td></td>
<td>MONTBLANCBRANDS</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>7 Country code of country of incorporation or organization (see instructions)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>LU</td>
<td></td>
</tr>
<tr>
<td></td>
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<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>8 Foreign law characterization (see instructions)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Country code of country of incorporation or organization (see instructions) |      |
|                                                                           | LU   |

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>9 Is the transferee foreign corporation a controlled foreign corporation?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**For Paperwork Reduction Act Notice, see separate instructions.**
### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>121</td>
</tr>
</tbody>
</table>

**10** Was cash the only property transferred?  
If "Yes," skip the remainder of Part III and go to Part IV.  

No [X] Yes

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>PROPERTY</td>
<td>723</td>
<td>723</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td>723</td>
<td>723</td>
<td></td>
</tr>
</tbody>
</table>

**11** Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
If "Yes," go to line 12b.  

No [X] Yes

**12a** 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.  

No [X] Yes

**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.  

No [X] Yes

**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.  

No [X] Yes

**d** Enter the transferred loss amount included in gross income as required under section 91 u.  
If "No," skip Section C and questions 14a through 15.  

**13** Did the transferor transfer property described in section 367(d)(4)?  
If "No," skip Section C and questions 14a through 15.  

No [X] Yes

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
14a  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?  

Yes  No

c  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

Supplemental Part III Information Required To Be Reported (see instructions)

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  %  (b) After  %

17  Type of nonrecognition transaction (see instructions)  

IRC SECTION 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)  

Yes  No

b  Gain recognition under section 904(f)(5)(F)  

Yes  No

c  Recapture under section 1503(d)  

Yes  No

d  Exchange gain under section 987  

Yes  No

19  Did this transfer result from a change in entity classification?  

Yes  No

20a  Did a domestic corporation make a distribution of property covered by section 367(e)(2)?  See instructions  

Yes  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) $  

c  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 covered by section 367(e)(1)?  See instructions  

Yes  No

Form 926 (Rev. 11-2018)
Form 926  
(Rev. November 2018)  
Department of the Treasury  
Internal Revenue Service  

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.  

Part I  
U.S. Transferor Information (see instructions)  

Name of transferor:  
THE SAINT PAUL FOUNDATION  
Identifying number:  
41–6031510  

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐</td>
<td>☑</td>
</tr>
</tbody>
</table>

2 If the transferor was a corporation, complete questions 2a through 2d.  

<table>
<thead>
<tr>
<th>a</th>
<th>b</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>☑</td>
<td>☐</td>
</tr>
</tbody>
</table>

If not, list the controlling shareholder(s) and their identifying number(s).  

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑</td>
<td>☐</td>
</tr>
</tbody>
</table>

If not, list the name and employer identification number (EIN) of the parent corporation.  

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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.  

<table>
<thead>
<tr>
<th>a</th>
<th>b</th>
<th>c</th>
<th>d</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>No</td>
<td></td>
<td></td>
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<tr>
<td>☑</td>
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<td>☑</td>
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<td></td>
<td></td>
</tr>
</tbody>
</table>

List the name and EIN of the transferor's partnership.  

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

Part II  
Transferee Foreign Corporation Information (see instructions)  

Name of transferee (foreign corporation):  
MOVENTAS HOLDINGS (LUXEMBOURG) SARL  
Identifying number:  
41–1765364  

6 Address (including country):  
8-10 AVENUE DE LA GARE  
LUXEMBOURG  
LU L–1610  
LUXEMBOURG  

7 Country code of country of incorporation or organization (see instructions):  
LU  

8 Foreign law characterization (see instructions):  
CORPORATION  

9 Is the transferee foreign corporation a controlled foreign corporation?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑</td>
<td>☐</td>
</tr>
</tbody>
</table>

For Paperwork Reduction Act Notice, see separate instructions.  
DAA  

Form 926 (Rev. 11-2018)
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
☐ Yes ☒ No

If "Yes," skip the remainder of Part III and go to Part IV.

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td>FOREIGN CURRENCY – GBP 564</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>564</td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
☐ Yes ☒ No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
☐ Yes ☒ No

If "No," go to line 13.

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?  
☐ Yes ☒ No

If "Yes," go to line 12b.

c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?  
☐ Yes ☒ No

If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.

d Enter the transferred loss amount included in gross income as required under section 911: $  
☐ Yes ☒ No

If "No," continue to line 12d. If "No," skip line 12d, and go to line 13.

13 Did the transferor transfer property described in section 367(d)(4)?  
☐ Yes ☒ No

If "No," skip Section C and questions 14a through 15.

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm’s length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals | | | | | | |

Form 926 (Rev. 11-2018)
14a 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? ☐ Yes ☐ No

c 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

Supplemental Part III Information Required To Be Reported (see instructions)

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 ______ % (b) After ______ %

17 Type of nonrecognition transaction (see instructions) IRC SECTION 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) ☐ Yes ☐ No
  b Gain recognition under section 904(f)(5)(F) ☐ Yes ☐ No
  c Recapture under section 1503(d) ☐ Yes ☐ No
  d Exchange gain under section 987 ☐ Yes ☐ No

19 Did this transfer result from a change in entity classification? ☐ Yes ☐ No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
  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) $ __________
  c 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 covered by section 367(e)(1)? See instructions ☐ Yes ☐ No
**Form 926**

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

Submit by a U.S. Transferor of Property

Part I U.S. Transferor Information

(see instructions)

**THE SAINT PAUL FOUNDATION**

<table>
<thead>
<tr>
<th>Name of transferor</th>
<th>Identifying number (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>THE SAINT PAUL FOUNDATION</td>
<td>41-6031510</td>
</tr>
</tbody>
</table>

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? [ ] Yes [ ] No

2. If the transferee 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 [ ] 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).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

   c. If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? [ ] Yes [ ] No

   If not, list the name and employer identification number (EIN) of the parent corporation.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

   d. Have basis adjustments under section 367(a)(4) been made? [ ] Yes [ ] 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.

   a. List the name and EIN of the transferor’s partnership.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td>THE COMMUNITY INVESTMENT GROUP</td>
<td>41-1765364</td>
</tr>
</tbody>
</table>

   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 [ ] No

   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)

   NAPSBURY LIMITED

5a. Identifying number, if any

6. Address (including country)

   COURTLANDS, PARKLANDS AVENUE, WEST SUSSEX UK BN12 4NG GREAT BRITAIN (UK)

5b. Reference ID number (see instructions)

   NAPSBURY

7. Country code of country of incorporation or organization (see instructions)

   UK

8. Foreign law characterization (see instructions)

   CORPORATION

9. Is the transferee foreign corporation a controlled foreign corporation? [ ] Yes [ ] No

For Paperwork Reduction Act Notice, see separate instructions.

DAA
Part III Information Regarding Transfer of Property

Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td>03/31/19</td>
<td></td>
<td></td>
<td></td>
<td>101</td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? [ ] Yes [x] No

If "Yes," skip the remainder of Part III and go to Part IV.

Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>03/31/19</td>
<td>STOCK</td>
<td>141</td>
<td>141</td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td>141</td>
<td>141</td>
<td></td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [x] No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? [ ] Yes [x] No

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? [ ] Yes [x] No

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? [ ] Yes [x] No

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: $ ____________

13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [x] No

If "No," skip Section C and questions 14a through 15.

Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

Form 926 (Rev. 11-2018)
14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

14b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

14c 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?  

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

14d 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)?  

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Supplemental Part III Information Required To Be Reported (see instructions)  

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 ________ %  (b) After ________ %  

17 Type of nonrecognition transaction (see instructions)  

   IRC SECTION 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)  
   Yes [X] No 

   b Gain recognition under section 904(f)(5)(F)  
   Yes [X] No 

   c 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 

20a 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) $ 

   c 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 [X] No 

21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  

   Yes [X] No
**Part I  U.S. Transferor Information**

<table>
<thead>
<tr>
<th>Name of transferor</th>
<th>Identifying number (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>THE SAINT PAUL FOUNDATION</td>
<td>41–6031510</td>
</tr>
</tbody>
</table>

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.
   - 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  
     - [ ] 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).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
</table>

   - c. If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?  
     - [ ] Yes  
     - [ ] No
     - If not, list the name and employer identification number (EIN) of the parent corporation.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
</table>

   - d. Have basis adjustments under section 367(a)(4) been made?  
     - [ ] Yes  
     - [ ] 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.
   - a. List the name and EIN of the transferor’s partnership.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
</table>

   - 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 established securities market?  
     - [ ] Yes  
     - [x] No

**Part II  Transferee Foreign Corporation Information**

<table>
<thead>
<tr>
<th>Name of transferee (foreign corporation)</th>
<th>Identifying number, if any</th>
</tr>
</thead>
<tbody>
<tr>
<td>PYRAMID HOLDINGS B.V.</td>
<td>41–1765364</td>
</tr>
</tbody>
</table>

6. Address (including country)
   - JOLLENMANKOF 22
   - AMSTERDAM, NL 1019GW, NETHERLANDS

7. Country code of country of incorporation or organization (see instructions)
   - NL

8. Foreign law characterization (see instructions)
   - CORPORATION

9. Is the transferee foreign corporation a controlled foreign corporation?  
   - [x] Yes  
   - [ ] No

For Paperwork Reduction Act Notice, see separate instructions.
Part III  Information Regarding Transfer of Property (see instructions)

Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10  Was cash the only property transferred?  

  If “Yes,” skip the remainder of Part III and go to Part IV.  

Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
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<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>05/29/18</td>
<td>PROMISSORY NOTE</td>
<td>13</td>
<td>13</td>
<td></td>
</tr>
</tbody>
</table>

Other property (not listed under another category)

<table>
<thead>
<tr>
<th>Property with built-in loss</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Totals</td>
<td>13</td>
</tr>
</tbody>
</table>

11  Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  

  If “Yes,” go to line 12b.

12a  Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  

  If “Yes,” continue 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 u $  

  If “No,” skip Section C and questions 14a through 15.

13  Did the transferor transfer property described in section 367(d)(4)?  

  If “No,” skip Section C and questions 14a through 15.

Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
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

At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  

Yes  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

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  No

Supplemental Part III Information Required To Be Reported (see instructions)

Enter the transferor's interest in the transferee foreign corporation before and after the transfer.

(a) Before  

(b) After  

%  

%  

Type of nonrecognition transaction (see instructions)  

IRC SECTION 351

Indicate whether any transfer reported in Part III is subject to any of the following.

a  

Gain recognition under section 904(f)(3)  

Yes  No

b  

Gain recognition under section 904(f)(5)(F)  

Yes  No

c  

Recapture under section 1503(d)  

Yes  No

d  

Exchange gain under section 987  

Yes  No

Did this transfer result from a change in entity classification?  

Yes  No

Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions.  

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) $ 

Yes  No

c  

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

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions.  

Yes  No
Form 926
Department of the Treasury
Internal Revenue Service

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

Part I U.S. Transferor Information

Name of transferor

THE SAINT PAUL FOUNDATION                      41–6031510

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? Yes [X] No

2 [Redacted]

b Did the transferee remain in existence after the transfer? Yes [X] No

[Redacted]

2a [Redacted]

b [Redacted]

2c If the transferee was a member of an affiliated group filing a consolidated return, was it the parent corporation? Yes [X] No

[Redacted]

2d Have basis adjustments under section 367(a)(4) been made? Yes [X] No

3 If the transferee 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.

a List the name and EIN of the transferee's partnership.

THE COMMUNITY INVESTMENT GROUP                   41–1765364

b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Yes [X] No

b [Redacted]

c Is the partner disposing of its entire interest in the partnership? Yes [X] No

c [Redacted]

d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Yes [X] No

c [Redacted]

Part II Transferee Foreign Corporation Information

Name of transferee (foreign corporation)

REDWOOD INVESTMENT LTD

Address (including country)

8TH FLOOR, NEWTON TOWER

PORT LOUIS MP MAURITIUS

Country code of country of incorporation or organization (see instructions)

MP

Foreign law characterization (see instructions)

LIMITED COMPANY

Is the transferee foreign corporation a controlled foreign corporation? Yes [X] No

For Paperwork Reduction Act Notice, see separate instructions.

DAA

OMB No. 1545-0026

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.

DAA

Form 926 (Rev. 11-2018)
**Part III  Information Regarding Transfer of Property (see instructions)**

### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
If "Yes," skip the remainder of Part III and go to Part IV.  

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td>STOCKS &amp; SECURITIES</td>
<td>1,424</td>
<td>1,424</td>
<td></td>
</tr>
</tbody>
</table>

Other property 
(not listed under another category)

Property with built-in loss

Totals  

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
If "Yes," go to line 12b.

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
If "Yes," continue to line 12b. If "No," skip lines 12c and 12d, and go to line 13.

12b 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.

12c 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.

12d Enter the transferred loss amount included in gross income as required under section 91 u $  
If "No," skip Section C and questions 14a through 15.

13 Did the transferor transfer property described in section 367(d)(4)?  
If "No," skip Section C and questions 14a through 15.

Form 926 (Rev. 11-2018)
14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

14b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

14c 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?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

14d 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)?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

Supplemental Part III Information Required To Be Reported (see instructions)  

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.  

<table>
<thead>
<tr>
<th>(a) Before</th>
<th>(b) After</th>
</tr>
</thead>
</table>

17 Type of nonrecognition transaction (see instructions) IRC SECTION 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) | Yes | No |
| (b) Gain recognition under section 904(f)(5)(F) | Yes | No |
| (c) Recapture under section 1503(d) | Yes | No |
| (d) Exchange gain under section 987 | Yes | No |

19 Did this transfer result from a change in entity classification?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

20b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) $  

20c 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)?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>
Form 926
Return by a U.S. Transferor of Property to a Foreign Corporation

Part I  U.S. Transferor Information (see instructions)

Name of transferor
THE SAINT PAUL FOUNDATION
Identifying number 41-6031510

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? □ Yes □ 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 □ 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  Identifying number

   c. If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? □ Yes □ No
      If not, list the name and employer identification number (EIN) of the parent corporation.

   Name of parent corporation  EIN of parent corporation

   d. Have basis adjustments under section 367(a)(4) been made? □ Yes □ 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.
   a. List the name and EIN of the transferor's partnership.

   Name of partnership  EIN of partnership

   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 □ No
   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)
   QMC TELECOM DO BRASIL CESSAO DE

5a. Identifying number, if any

   5b. Reference ID number (see instructions)

6. Address (including country)
   RUA GOMES DE CARVALHO
   SAO PAULO  BR 04547-005  BRAZIL

7. Country code of country of incorporation or organization (see instructions)
   BR

8. Foreign law characterization (see instructions)
   CORPORATION

9. Is the transferee foreign corporation a controlled foreign corporation? □ Yes □ No

For Paperwork Reduction Act Notice, see separate instructions.
DAA
**Part III Information Regarding Transfer of Property (see instructions)**

### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?

- Yes ☑️ No ☐

If "Yes," skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>10/23/19</td>
<td>STOCKS &amp; SECURITIES</td>
<td>40</td>
<td>40</td>
<td></td>
</tr>
</tbody>
</table>

| Other property (not listed under another category) | |

| Property with built-in loss | |

| Totals | 40 | 40 |

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?

- Yes ☑️ No ☐

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?

- Yes ☑️ No ☐

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 u.

13 Did the transferor transfer property described in section 367(d)(4)?

If "No," skip Section C and questions 14a through 15.

- Yes ☑️ No ☐

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals | |

---

Form 926 (Rev. 11-2018)
Additional Information Regarding Transfer of Property

(b) 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) $ 

 Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  

 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)?  

 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?  

 Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) $ 

 Did this transfer result from a change in entity classification?  

 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions 

 Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  

 (a) Before % (b) After %  

 Type of nonrecognition transaction (see instructions) 

 Indicate whether any transfer reported in Part III is subject to any of the following.  

 Gain recognition under section 904(f)(3)  

 Gain recognition under section 904(f)(5)(F)  

 Recapture under section 1503(d)  

 Exchange gain under section 987  

 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)?  

 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions
Part I  U.S. Transferor Information (see instructions)

Name of transferor

THE SAINT PAUL FOUNDATION

Identifying number

41–6031510

1  Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? □ Yes □ 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 □ No

b  Did the transferee remain in existence after the transfer? □ Yes □ No

If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder

Identifying number

Name of parent corporation

EIN of parent corporation

3  If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? □ Yes □ No

If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation

EIN of parent corporation

4  Have basis adjustments under section 367(a)(4) been made? □ Yes □ No

Part II  Transferee Foreign Corporation Information (see instructions)

Name of transferee (foreign corporation)

SICCAR POINT GUERNSEY INVESTMENT LT

Identifying number, if any

98–1194788

Address (including country)

EAST WING, TRAFALGAR COURT
ST PETER PORT  GK  GY1 3PP  GUERNSEY

Country code of country of incorporation or organization (see instructions)

GK

Foreign law characterization (see instructions)

CORPORATION

Is the transferee foreign corporation a controlled foreign corporation? □ Yes □ No

For Paperwork Reduction Act Notice, see separate instructions.

DAA

Form 926 (Rev. 11-2018)
### Part III Information Regarding Transfer of Property

#### Section A—Cash

<table>
<thead>
<tr>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10. Was cash the only property transferred? [ ] Yes [x] No

If “Yes,” skip the remainder of Part III and go to Part IV.

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>12/31/18 STOCK &amp; SECURITIES</td>
<td>528,200</td>
<td>528,200</td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

11. Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [x] No

12a. Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a specified foreign corporation? [ ] Yes [x] No

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? [ ] Yes [x] No

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? [ ] Yes [x] No

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 911:[ ]

13. Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [x] No

If “No,” skip Section C and questions 14a through 15.

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm’s length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
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 __________ %  (b) After ________ %

17  Type of nonrecognition transaction (see instructions) u IRC SECTION 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) ☐ Yes ☑ No
   b Gain recognition under section 904(f)(5)(F) ☐ Yes ☑ No
   c Recapture under section 1503(d) ☐ Yes ☑ No
   d Exchange gain under section 987 ☐ Yes ☑ No

19  Did this transfer result from a change in entity classification? ☐ Yes ☑ No

20a  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
     If "Yes," complete lines 20b and 20c.
     ☐ Yes ☑ No

20b  Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) u $ __________

20c  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
     covered by section 367(e)(1)? See instructions ☐ Yes ☑ No
Form 926
(Rev. November 2018)
Department of the Treasury
Internal Revenue Service

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.

Part I  U.S. Transferor Information (see instructions)

<table>
<thead>
<tr>
<th>Name of transferor</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td>THE SAINT PAUL FOUNDATION</td>
<td>41–6031510</td>
</tr>
</tbody>
</table>

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.
   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? [ ] Yes [x] No

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tr>
</tbody>
</table>

3. 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.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

4. [ ] Have basis adjustments under section 367(a)(4) been made? [ ] Yes [x] No

3. a. List the name and EIN of the transferor's partnership.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<tr>
<td></td>
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<td></td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Part II  Transferee Foreign Corporation Information (see instructions)

4. Name of transferee (foreign corporation)
   STAMPLI LTD

5a. Identifying number, if any
   STAMPLI

5b. Reference ID number (see instructions)
   STAMPLI

6. Address (including country)
   701 W EVELYN AVE, SUITE B
   MOUNTAIN VIEW, CALIFORNIA 94041

7. Country code of country of incorporation or organization (see instructions)
   CJ

8. Foreign law characterization (see instructions)
   CORPORATION

9. Is the transferee foreign corporation a controlled foreign corporation? [ ] Yes [x] No

For Paperwork Reduction Act Notice, see separate instructions.
DAA
**Part III  Information Regarding Transfer of Property** (see instructions)

**Section A—Cash**

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? [ ] Yes [ ] No

If “Yes,” skip the remainder of Part III and go to Part IV.

**Section B—Other Property (other than intangible property subject to section 367(d))**

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>05/22/18 SAFE</td>
<td>94</td>
<td>94</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? [ ] Yes [ ] No

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? [ ] Yes [ ] No

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? [ ] Yes [ ] No

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 u $ __________

13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

If “No,” skip Section C and questions 14a through 15.

**Section C—Intangible Property Subject to Section 367(d)**

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
14a  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? Yes ☐  No ☐

c  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) u $ __________.

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 ☐

Supplemental Part III Information Required To Be Reported (see instructions)

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 _________ %  (b) After _________ %

17  Type of nonrecognition transaction (see instructions) u IRC SECTION 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) Yes ☒  No ☐

b  Gain recognition under section 904(f)(5)(F) Yes ☒  No ☐

c  Recapture under section 1503(d) Yes ☒  No ☐

d  Exchange gain under section 987 Yes ☒  No ☐

19  Did this transfer result from a change in entity classification? Yes ☒  No ☐

20a  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

   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) u $ __________

c  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 covered by section 367(e)(1)? See instructions

   Yes ☒  No ☐
**Part I U.S. Transferor Information** (see instructions)

<table>
<thead>
<tr>
<th>Name of transferor</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td>THE SAINT PAUL FOUNDATION</td>
<td>41-6031510</td>
</tr>
</tbody>
</table>

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? [Yes] [No] 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] [No] No
   - b. Did the transferor remain in existence after the transfer? [Yes] [No] Yes

   If not, list the controlling shareholder(s) and their identifying number(s).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
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</tr>
</tbody>
</table>

   c. If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? [Yes] [No] Yes

   If not, list the name and employer identification number (EIN) of the parent corporation.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<tr>
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<td></td>
</tr>
</tbody>
</table>

   d. Have basis adjustments under section 367(a)(4) been made? [Yes] [No] Yes

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.
   - a. List the name and EIN of the transferor’s partnership.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
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</tr>
</tbody>
</table>

**Part II Transferee Foreign Corporation Information** (see instructions)

4. Name of transferee (foreign corporation) TEMPUSTRANSFERCO 41-16765364

5a. Identifying number, if any

5b. Reference ID number (see instructions) TEMPUSTRANSFERCO

6. Address (including country) 1830, 407-2ND STREET SW ALBERTA CALGARY CA T2P 2Y3 CANADA

7. Country code of country of incorporation or organization (see instructions) CA

8. Foreign law characterization (see instructions) CORPORATION

9. Is the transferee foreign corporation a controlled foreign corporation? [Yes] [No] No

GO TO www.irs.gov/Form926 for instructions and the latest information.
### Part III  Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
   If "Yes," skip the remainder of Part III and go to Part IV.

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>FOREIGN CURRENCY — CAD</td>
<td>907</td>
<td>907</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
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</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Property with built-in loss</th>
<th></th>
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<th></th>
<th></th>
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</thead>
<tbody>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>907</td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?
   
   If "Yes," go to line 12b.

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?

   If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.

12b 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.

12c 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.

12d Enter the transferred loss amount included in gross income as required under section 91 u $ ________________

13 Did the transferor transfer property described in section 367(d)(4)?

   If "No," skip Section C and questions 14a through 15.

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
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 _______ %  (b) After _______ %

17 Type of nonrecognition transaction (see instructions) u IRC SECTION 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) Yes X No
   b Gain recognition under section 904(f)(5)(F) Yes X No
   c 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

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
   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) u $ ____________
   c 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 X No

21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation
   covered by section 367(e)(1)? See instructions ____________

Form 926 (Rev. 11-2018)
Identifying number (see instructions)

Part I U.S. Transferor Information (see instructions)

THE SAINT PAUL FOUNDATION

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? ☐ Yes ☑ 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 ☑ 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

   Identifying number

   __________________________________________________________

   __________________________________________________________

   __________________________________________________________

   __________________________________________________________

   __________________________________________________________

   If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? ☐ Yes ☑ No

   If not, list the name and employer identification number (EIN) of the parent corporation.

   Name of parent corporation

   EIN of parent corporation

   __________________________________________________________

   __________________________________________________________

   __________________________________________________________

   __________________________________________________________

   d Have basis adjustments under section 367(a)(4) been made? ☐ Yes ☑ 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.
   a List the name and EIN of the transferor's partnership.

   Name of partnership

   EIN of partnership

   __________________________________________________________

   __________________________________________________________

   __________________________________________________________

   __________________________________________________________

Part II Transferee Foreign Corporation Information (see instructions)

4 Name of transferee (foreign corporation)

   TYRANNEX ENERGY LTD

5a Identifying number, if any

   41–6031510

5b Reference ID number (see instructions)

   TYRANNEX

6 Address (including country)

   1100A, 520–5TH AVE SW
   CALGARY, CA T2P 3R7 CANADA

7 Country code of country of incorporation or organization (see instructions)

   CA

8 Foreign law characterization (see instructions)

   CORPORATION

9 Is the transferee foreign corporation a controlled foreign corporation? ☐ Yes ☑ No

For Paperwork Reduction Act Notice, see separate instructions.
### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? [ ] Yes [X] No

If "Yes," skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td>FOREIGN CURRENCY—CAD 3,837</td>
<td>3,837</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Property with built-in loss

Totals 3,837 3,837

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [X] No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? [ ] Yes [X] No

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? [ ] Yes [X] No

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? [ ] Yes [X] No

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 u $  

13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [X] No

If "No," skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals
14a 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? Yes No
c 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

Supplemental Part III Information Required To Be Reported (see instructions)

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 % (b) After %
   (c) Gain recognition under section 904(f)(3) Yes No
   (d) Gain recognition under section 904(f)(5)(F) Yes No
   (e) Recapture under section 1503(d) Yes No
   (f) Exchange gain under section 987 Yes No

17 Type of nonrecognition transaction (see instructions) IRC SECTION 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) Yes No
   (b) Gain recognition under section 904(f)(5)(F) Yes No
   (c) Recapture under section 1503(d) Yes No
   (d) Exchange gain under section 987 Yes No

19 Did this transfer result from a change in entity classification? Yes No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If “Yes,” complete lines 20b and 20c.
   (a) Before % (b) After %
   (c) Exchange gain under section 987 Yes No

20b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) $ 

20c 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 covered by section 367(e)(1)? See instructions. If “Yes,” complete lines 20b and 20c.
   (a) Before % (b) After %
   (c) Exchange gain under section 987 Yes No
**Part I U.S. Transferor Information**

**Name of transferor**

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
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</tbody>
</table>

**Identifying number** 41–6031510

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.
   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 [ ] 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).

<table>
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<tr>
<th>Controlling shareholder</th>
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</tbody>
</table>

   c. If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? [ ] Yes [ ] No
      If not, list the name and employer identification number (EIN) of the parent corporation.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
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</tr>
</tbody>
</table>

   d. Have basis adjustments under section 367(a)(4) been made? [ ] Yes [ ] 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.
   a. List the name and EIN of the transferor’s partnership.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
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</tbody>
</table>

   b. Did the partner pick up its pro rata share of gain on the transfer of partnership assets? [ ] Yes [x] No
   c. Is the partner disposing of its entire interest in the partnership? [x] Yes [ ] No
   d. Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? [ ] Yes [x] No

**Part II Transferee Foreign Corporation Information**

**Name of transferee (foreign corporation)**

<table>
<thead>
<tr>
<th>Name of transferee (foreign corporation)</th>
<th>Identifying number, if any</th>
</tr>
</thead>
<tbody>
<tr>
<td>VESTA ENERGY CORP</td>
<td></td>
</tr>
</tbody>
</table>

5a. Identifying number, if any [ ]

5b. Reference ID number (see instructions)

<table>
<thead>
<tr>
<th>Reference ID number</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td>VESTA</td>
<td></td>
</tr>
</tbody>
</table>

6. Address (including country)

<table>
<thead>
<tr>
<th>Address (including country)</th>
<th>Country code of country of incorporation or organization</th>
</tr>
</thead>
<tbody>
<tr>
<td>2200, 520–3RD AVENUE SW</td>
<td>CA</td>
</tr>
</tbody>
</table>

7. Country code of country of incorporation or organization (see instructions)

<table>
<thead>
<tr>
<th>Country code of country of incorporation or organization</th>
</tr>
</thead>
<tbody>
<tr>
<td>CA</td>
</tr>
</tbody>
</table>

8. Foreign law characterization (see instructions)

<table>
<thead>
<tr>
<th>Foreign law characterization</th>
</tr>
</thead>
<tbody>
<tr>
<td>CORPORATION</td>
</tr>
</tbody>
</table>

9. Is the transferee foreign corporation a controlled foreign corporation? [ ] Yes [x] No

---

For Paperwork Reduction Act Notice, see separate instructions.
Part III  Information Regarding Transfer of Property (see instructions)

Section A—Cash

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
<th>(c) Description of property</th>
<th>(d) Fair market value on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
If "Yes," skip the remainder of Part III and go to Part IV.  
☐ Yes ☒ No

Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
<th>(c) Description of property</th>
<th>(d) Fair market value on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td>FOREIGN CURRENCY—CAD</td>
<td>3,489</td>
<td>3,489</td>
<td></td>
</tr>
<tr>
<td>Other property</td>
<td></td>
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</tr>
<tr>
<td>(not listed under another category)</td>
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<tr>
<td>Property with built-in loss</td>
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<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>3,489</td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
☐ Yes ☒ No

12a 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.  
☐ Yes ☒ No

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.  
☐ Yes ☒ No

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.  
☐ Yes ☒ No

d Enter the transferred loss amount included in gross income as required under section 91 u $  
☐ Yes ☒ No

13 Did the transferor transfer property described in section 367(d)(4)?  
If "No," skip Section C and questions 14a through 15.  
☐ Yes ☒ No

Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
<th>(c) Description of property</th>
<th>(d) Useful life</th>
<th>(e) Arm's length price on date of transfer</th>
<th>(f) Cost or other basis</th>
<th>(g) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
14a 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?  
   Yes  
   No

c 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

Supplemental Part III Information Required To Be Reported (see instructions)

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  
   (b) After

17 Type of nonrecognition transaction (see instructions) IRC SECTION 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)  
   Yes  
   No
   b Gain recognition under section 904(f)(5)(F)  
   Yes  
   No
   c Recapture under section 1503(d)  
   Yes  
   No
   d Exchange gain under section 987  
   Yes  
   No

19 Did this transfer result from a change in entity classification?  
   Yes  
   No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions 
   Yes  
   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) $ 
   c 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 covered by section 367(e)(1)? See instructions  
   Yes  
   No
**Part I  U.S. Transferor Information**

<table>
<thead>
<tr>
<th>Name of transferor</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td>THE SAINT PAUL FOUNDATION</td>
<td>41-6031510</td>
</tr>
</tbody>
</table>

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  
   - Yes  
   - No

2. If the transferee was a corporation, complete questions 2a through 2d.
   - (a) The transferor must have controlled the transferee (under section 368(c)) by five or fewer domestic corporations.  
     - Yes  
     - 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).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
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</table>

(c) If the transferee was a member of an affiliated group filing a consolidated return, was it the parent corporation?  
   - Yes  
   - No

If not, list the name and employer identification number (EIN) of the parent corporation.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
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</thead>
<tbody>
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</tr>
</tbody>
</table>

(d) Have basis adjustments under section 367(a)(4) been made?  
   - Yes  
   - No

3. If the transferee 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.

   - (a) List the name and EIN of the transferor’s partnership.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
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</thead>
<tbody>
<tr>
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</tr>
</tbody>
</table>

**Part II  Transferee Foreign Corporation Information**

4. Name of transferee (foreign corporation)
   - WATERTON MINING (LUXEMBOURG) S.A.R.
   - Address (including country)
     - 6 RUE EUGENE RUPPERT
     - LUXEMBOURG  LU  L-2453  LUXEMBOURG
   - Country code of country of incorporation or organization (see instructions)
     - LU

5. (a) Identifying number, if any
   - WATERTON MINING (LUXEMBOURG) S.A.R.
   - Reference ID number (see instructions)
     - WATERTON

6. Is the transferee foreign corporation a controlled foreign corporation?  
   - Yes  
   - No
## Part III  Information Regarding Transfer of Property (see instructions)

### Section A—Cash

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
<th>(c) Description of property</th>
<th>(d) Fair market value on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
   If “Yes,” skip the remainder of Part III and go to Part IV.  
   [ ] Yes ☑ No

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
<th>(c) Description of property</th>
<th>(d) Fair market value on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>12/31/18</td>
<td>STOCK</td>
<td>731</td>
<td>731</td>
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<tr>
<td>Other property</td>
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<tr>
<td>(not listed under another category)</td>
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<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
   [ ] Yes ☑ No

12a 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.  
   [ ] Yes ☑ No

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.  
   [ ] Yes ☑ No

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.  
   [ ] Yes ☑ No

d Enter the transferred loss amount included in gross income as required under section 91 u $  
   [ ] Yes ☑ No

13 Did the transferor transfer property described in section 367(d)(4)?  
   If “No,” skip Section C and questions 14a through 15.  
   [ ] Yes ☑ No

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
<th>(c) Description of property</th>
<th>(d) Useful life</th>
<th>(e) Arm’s length price on date of transfer</th>
<th>(f) Cost or other basis</th>
<th>(g) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

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Form 926 (Rev. 11-2018)
14a 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? ☐ Yes ☐ No

c 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

Supplemental Part III Information Required To Be Reported (see instructions)

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 _____ % (b) After _____ %

17 Type of nonrecognition transaction (see instructions) IRC SECTION 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) ☐ Yes ☐ No
   b Gain recognition under section 904(f)(5)(F) ☐ Yes ☐ No
   c Recapture under section 1503(d) ☐ Yes ☐ No
   d Exchange gain under section 987 ☐ Yes ☐ No

19 Did this transfer result from a change in entity classification? ☐ Yes ☐ No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
   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) $ ______
   c 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 covered by section 367(e)(1)? See instructions ☐ Yes ☐ No
Form 926  
(Rev. November 2018)  
Department of the Treasury  
Internal Revenue Service  

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

u Go to www.irs.gov/Form926 for instructions and the latest information.  
u 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: THE SAINT PAUL FOUNDATION  
Identifying number: 41–6031510  

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  
   Yes ☐  No ☑

2. If the transferee 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 ☐  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).  

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tr>
</tbody>
</table>

   c. If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?  
      Yes ☐  No ☑

      If not, list the name and employer identification number (EIN) of the parent corporation.  

   Name of parent corporation:  
   EIN of parent corporation:  

   d. Have basis adjustments under section 367(a)(4) been made?  
      Yes ☐  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.  
   a. List the name and EIN of the transferor's partnership.  

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
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<tr>
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<td></td>
</tr>
</tbody>
</table>

   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 ☐  No ☑
   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): WLR/TRF H MN8 SUPERHOLDCO LLC  
   Identifying number, if any: 66–0821466  

5a. Reference ID number (see instructions)  
   5b. Reference ID number (see instructions)  

6. Address (including country):  
   2001 ROSS AVENUE, SUITE 3400  
   TEXAS  
   DALLAS  
   75201  

7. Country code of country of incorporation or organization (see instructions):  
   MH  

8. Foreign law characterization (see instructions):  
   CORPORATION  

9. Is the transferee foreign corporation a controlled foreign corporation?  
   Yes ☐  No ☑
Part III  Information Regarding Transfer of Property (see instructions)

Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10  Was cash the only property transferred?  
   If "Yes," skip the remainder of Part III and go to Part IV.  

Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>11/25/19</td>
<td>OTHER PROPERTY</td>
<td>5,698</td>
<td>5,698</td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
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<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
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<tr>
<td>Totals</td>
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<td></td>
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<td></td>
<td>5,698</td>
</tr>
</tbody>
</table>

11  Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
   □ Yes  ☒ No

12a  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.  
   □ Yes  ☒ No

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.  
   □ Yes  ☒ No

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.  
   □ Yes  ☒ No

d  Enter the transferred loss amount included in gross income as required under section 91 u. $  
   □ Yes  ☒ No

13  Did the transferor transfer property described in section 367(d)(4)?  
   If "No," skip Section C and questions 14a through 15.  
   □ Yes  ☒ No

Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
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<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
14a 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?  
Yes No

c 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) u $  .

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

---

Supplemental Part III Information Required To Be Reported (see instructions)

---

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 % (b) After %

17 Type of nonrecognition transaction (see instructions) IRC SECTION 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) Yes No

b Gain recognition under section 904(f)(5)(F) Yes No

c Recapture under section 1503(d) Yes No

d Exchange gain under section 987 Yes No

19 Did this transfer result from a change in entity classification? Yes No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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) u $  

c 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 covered by section 367(e)(1)? See instructions Yes No

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

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.

Part I U.S. Transferor Information (see instructions)

Name of transferor

THE SAINT PAUL FOUNDATION

Identifying number (see instructions)

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? Yes 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 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

      Identifying number

      

      

      

      

      

      

   c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? Yes No

      If not, list the name and employer identification number (EIN) of the parent corporation.

      Name of parent corporation

      EIN of parent corporation

   d Have basis adjustments under section 367(a)(4) been made? Yes 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.

   a List the name and EIN of the transferor’s partnership.

   Name of partnership

   EIN of partnership

   

   

   

   

   

Part II Transferee Foreign Corporation Information (see instructions)

Name of transferee (foreign corporation)

REDWOOD INVESTMENT LTD

Identifying number, if any

5a

20–4748517

5b Reference ID number (see instructions)

Address (including country)

8TH FLOOR, NEWTON TOWER

PORT LOUIS MP MAURITIUS

Country code of country of incorporation or organization (see instructions)

MP

Foreign law characterization (see instructions)

LIMITED COMPANY

Is the transferee foreign corporation a controlled foreign corporation? Yes No
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
   
   If "Yes," skip the remainder of Part III and go to Part IV.  
   
   Yes [X] No

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>08/01/19</td>
<td>STOCKS &amp; SECURITIES</td>
<td>1,240</td>
<td>1,240</td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1,240</td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
   
   If "Yes," go to line 12b.  
   
   Yes [X] No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
   
   If "Yes," continue to line 12b.  
   
   Yes [X] No

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.  
   
   Yes [X] No

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.  
   
   Yes [X] No

d Enter the transferred loss amount included in gross income as required under section 91 u $  

13 Did the transferor transfer property described in section 367(d)(4)?  
   
   If "No," skip Section C and questions 14a through 15.  
   
   Yes [X] No

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Arm's length price on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
</table>

Property described in sec. 367(d)(4)  

Totals  

DAA
Part IV   Additional Information Regarding Transfer of Property (see instructions)

14a 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? ................................................................................................................. Yes  No
c 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) u $ ...............................................................  
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

Supplemental Part III Information Required To Be Reported (see instructions)

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 _________ %  (b) After _________ %  
17 Type of nonrecognition transaction (see instructions) u IRC SECTION 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) ........................................................................... Yes  No
   b Gain recognition under section 904(f)(5)(F) ................................................................. Yes  No
   c Recapture under section 1503(d) .................................................................................... Yes  No
   d Exchange gain under section 987 .................................................................................. Yes  No
19 Did this transfer result from a change in entity classification? ............................................. Yes  No
20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
   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) u $ .........................................................................................
   c 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
covered by section 367(e)(1)? See instructions ........................................................................ Yes  No
**Part I  U.S. Transferor Information** (see instructions)

**THE SAINT PAUL FOUNDATION**

**Identifying number** (see instructions)

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?</td>
<td>Yes</td>
<td>X No</td>
</tr>
<tr>
<td>2 If the transferee was a corporation, complete questions 2a through 2d.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>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?</td>
<td>Yes</td>
<td>X No</td>
</tr>
<tr>
<td>b Did the transferor remain in existence after the transfer?</td>
<td>Yes</td>
<td>X No</td>
</tr>
</tbody>
</table>

If not, list the controlling shareholder(s) and their identifying number(s).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<tr>
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<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| 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.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| d Have basis adjustments under section 367(a)(4) been made? | Yes | X No |

**Part II  Transferee Foreign Corporation Information** (see instructions)

**ANOKION SA**

**5a Identifying number, if any**

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>5a Identifying number, if any</td>
<td>X Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

**6 Address (including country)**

| Country code of country of incorporation or organization (see instructions) |
|-----------------------------|-----------------------------|
| ANOKION | ANOKION |
| EN RUHOZ, CH. DE LA DENT L'OCHE 1A | EN RUHOZ, CH. DE LA DENT L'OCHE 1A |
| SWITZERLAND | SWITZERLAND |

<table>
<thead>
<tr>
<th>EIN of partnership</th>
<th>20–3654598</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name of partnership</td>
<td>ADAMS STREET PARTNERSHIP FUND</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>7 Country code of country of incorporation or organization (see instructions)</td>
<td>Yes</td>
<td>X No</td>
</tr>
<tr>
<td>8 Foreign law characterization (see instructions)</td>
<td>X Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

For Paperwork Reduction Act Notice, see separate instructions.
### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td>07/11/19</td>
<td></td>
<td></td>
<td></td>
<td>54</td>
</tr>
</tbody>
</table>

10 **Was cash the only property transferred?**

- Yes
- No

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>06/06/19</td>
<td>COMMON &amp; PREFERRED STOCK</td>
<td>79</td>
<td>79</td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td>79</td>
<td>79</td>
<td></td>
</tr>
</tbody>
</table>

11 **Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?**

- Yes
- No

12a **Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?**

- Yes
- No

12b **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?**

- Yes
- No

12c **Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?**

- Yes
- No

12d **Enter the transferred loss amount included in gross income as required under section 91 u $**

- Yes
- No

13 **Did the transferor transfer property described in section 367(d)(4)?**

- Yes
- No

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
14a Did the transferee 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? 

| Yes | No |
---|---|

c Did the transferee 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) u $ 

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 |
---|---|

Supplemental Part III Information Required To Be Reported (see instructions) 

---

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 % (b) After % 

17 Type of nonrecognition transaction (see instructions) u IRC SECTION 351 

18 Indicate whether any transfer reported in Part III is subject to any of the following. 

- Gain recognition under section 904(f)(3) 
- Gain recognition under section 904(f)(5)(F) 
- Recapture under section 1503(d) 
- Exchange gain under section 987 

| Yes | No |
---|---|

19 Did this transfer result from a change in entity classification? 

| Yes | No |
---|---|

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. 

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) u $ 

| Yes | No |
---|---|

c 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 covered by section 367(e)(1)? See instructions. 

| Yes | No |
---|---|
Return by a U.S. Transferor of Property to a Foreign Corporation

Part I  U.S. Transferor Information (see instructions)

Name of transferor

THE SAINT PAUL FOUNDATION

Identifying number

41–6031510

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? ☐ Yes ☒ 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 ☒ 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 Identifying number

Name of parent corporation EIN of parent corporation

Name of transferee (foreign corporation)

ADAMS STREET PARTNERSHIP FUND

Identifying number

20–3654598

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.

a List the name and EIN of the transferor’s partnership.

Name of partnership EIN of partnership

ADAMS STREET PARTNERSHIP FUND 20–3654598

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 ☒ No

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)

REDWOOD INVESTMENT LTD

5a Identifying number, if any

20–4748517

6 Address (including country)

8TH FLOOR, NEWTON TOWER

PORT LOUIS MP MAURITIUS

7 Country code of country of incorporation or organization (see instructions)

MP

8 Foreign law characterization (see instructions)

LIMITED COMPANY

9 Is the transferee foreign corporation a controlled foreign corporation? ☒ Yes ☐ No

For Paperwork Reduction Act Notice, see separate instructions.
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**10** Was cash the only property transferred?  
**Yes** ☐ **No** ☒

If “Yes,” skip the remainder of Part III and go to Part IV.

#### Section B—Other Property (other than intangible property subject to section 367(d))

**Stock and securities**

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>08/01/19</td>
<td>STOCKS &amp; SECURITIES</td>
<td>117</td>
<td>117</td>
<td></td>
</tr>
</tbody>
</table>

**Inventory**

**Other property (not listed under another category)**

**Property with built-in loss**

**Totals**  
117 117

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Totals**

*Form 926 (Rev. 11-2018)*
Part IV Additional Information Regarding Transfer of Property (see instructions)

14a 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? ☐ Yes ☐ No

c 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

Supplemental Part III Information Required To Be Reported (see instructions)

Form 926 (Rev. 11-2018)
**Part I U.S. Transferor Information (see instructions)**

**THE SAINT PAUL FOUNDATION**

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?</td>
<td>☑️ No</td>
<td></td>
</tr>
<tr>
<td>2 If the transferee was a corporation, complete questions 2a through 2d.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>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?</td>
<td>☐ Yes ☑️ No</td>
<td></td>
</tr>
<tr>
<td>b Did the transferor remain in existence after the transfer?</td>
<td>☐ Yes ☑️ No</td>
<td></td>
</tr>
<tr>
<td>If not, list the controlling shareholder(s) and their identifying number(s).</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? | ☐ Yes ☑️ No |
| If not, list the name and employer identification number (EIN) of the parent corporation. | |

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| d Have basis adjustments under section 367(a)(4) been made? | ☐ Yes ☑️ 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. | |
| a List the name and EIN of the transferor’s partnership. | |

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADAMS STREET PARTNERSHIP FUND</td>
<td>26–1268649</td>
</tr>
</tbody>
</table>

| 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 ☑️ No |
| 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)**

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>4 Name of transferee (foreign corporation)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>BCPE BREEZE CAYMAN ATSUMI, LLC</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5a Identifying number, if any</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5b Reference ID number (see instructions)</td>
<td>BCPEATSUMI</td>
<td></td>
</tr>
<tr>
<td>6 Address (including country)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>UGLAND HOUSE, SOUTH CHURCH STREET</td>
<td></td>
<td></td>
</tr>
<tr>
<td>GEORGE TOWN</td>
<td>CJ KY1–1104 CAYMAN ISLANDS</td>
<td></td>
</tr>
<tr>
<td>7 Country code of country of incorporation or organization (see instructions)</td>
<td>CJ</td>
<td></td>
</tr>
<tr>
<td>8 Foreign law characterization (see instructions)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| CORPORATION | |

For Paperwork Reduction Act Notice, see separate instructions.
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? □ Yes □ No

If "Yes," skip the remainder of Part III and go to Part IV.

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>29</td>
<td>29</td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Property with built-in loss | | | | | |
| Totals | | | 29 | 29 | |

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? □ Yes □ No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? □ Yes □ No

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? □ Yes □ No

c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? □ Yes □ No

d Enter the transferred loss amount included in gross income as required under section 91 u $ __________

13 Did the transferor transfer property described in section 367(d)(4)? □ Yes □ No

If "No," skip Section C and questions 14a through 15.

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
**Part IV**  Additional Information Regarding Transfer of Property (see instructions)

14a  Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

b  At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

c  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?

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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) u $

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
</table>

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)?

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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Supplemental Part III Information Required To Be Reported (see instructions)

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Form 926 (Rev. 11-2018)
Part I U.S. Transferor Information (see instructions)

Name of transferor

THE SAINT PAUL FOUNDATION
41-6031510

1  Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  ..................................................  ✔ Yes  ☒ 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  ☒ 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

 Identifying number


c  If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?  ..................................................  ✔ Yes  ☒ No

      If not, list the name and employer identification number (EIN) of the parent corporation.

 Name of parent corporation

 EIN of parent corporation

 d  Have basis adjustments under section 367(a)(4) been made?  ..................................................  ✔ Yes  ☒ 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.

   a  List the name and EIN of the transferor’s partnership.

 Name of partnership

 EIN of partnership

 ADAMS STREET PARTNERSHIP FUND
26-1268649

   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  ☒ No

   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)

 BCPE BREEZE CAYMAN CHITOSE, LLC

5a  Identifying number, if any

5b  Reference ID number (see instructions)

6  Address (including country)

 UGLAND HOUSE, SOUTH CHURCH STREET

 GEORGE TOWN  CJ KY1-1104  CAYMAN ISLANDS

7  Country code of country of incorporation or organization (see instructions)

 CJ

8  Foreign law characterization (see instructions)

 CORPORATION

9  Is the transferee foreign corporation a controlled foreign corporation?  ..................................................  ✔ Yes  ☒ No
### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
   Yes ☐ No ☑

If "Yes," skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
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<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19 PARTNERSHIP INTEREST</td>
<td>130</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Other property (not listed under another category)

| Property with built-in loss |                     |                             |                                          |                        |                               |
| Totals                     |                     |                             |                                          |                        |                               |

13 Did the transferor transfer property described in section 367(d)(4)?  
   Yes ☐ No ☑

If "No," skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
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<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

Form 926 (Rev. 11-2018)
**Part IV  Additional Information Regarding Transfer of Property**

16. Enter the transferor's interest in the transferee foreign corporation before and after the transfer.
   
   (a) Before __________ %  (b) After __________ %

17. Type of nonrecognition transaction (see instructions) u IRC SECTION 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 1503(d)  
   d. Exchange gain under section 987  

19. Did this transfer result from a change in entity classification?
   
   Yes ☒ No

20a. Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
   
   Yes ☒ No

20b. Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) u $ __________

20c. 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 covered by section 367(e)(1)? See instructions
   
   Yes ☒ No
Part 1  U.S. Transferor Information (see instructions)

Name of transferor

THE SAINT PAUL FOUNDATION 41–6031510

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? ☑ Yes ☑ No

2 If the transferee 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 ☑ No
   b Did the transferor remain in existence after the transfer? ☑ Yes ☑ No

Controlling shareholder

Identifying number

If not, list the controlling shareholder(s) and their identifying number(s).

Name of parent corporation

EIN of parent corporation

c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? ☑ Yes ☑ No

If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation

EIN of parent corporation

d Have basis adjustments under section 367(a)(4) been made? ☑ Yes ☑ 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.
   a List the name and EIN of the transferor’s partnership.

Name of partnership

EIN of partnership

ADAMS STREET PARTNERSHIP FUND 26–1268649

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 ☑ No

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)

Name of transferee (foreign corporation)

BCPE BREEZE CAYMAN HIRADOMINAMI, LL

6 Address (including country)

UGLAND HOUSE, SOUTH CHURCH STREET

GEORGE TOWN CJ KY1–1104 CAYMAN ISLANDS

7 Country code of country of incorporation or organization (see instructions)

CJ

8 Foreign law characterization (see instructions)

CORPORATION

9 Is the transferee foreign corporation a controlled foreign corporation? ☑ Yes ☑ No

For Paperwork Reduction Act Notice, see separate instructions.

DAA
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
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</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 **Was cash the only property transferred?**

If "Yes," skip the remainder of Part III and go to Part IV.

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
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<tr>
<th>Type of property</th>
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<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>79</td>
<td>79</td>
<td></td>
</tr>
</tbody>
</table>

Other property (not listed under another category)

| Property with built-in loss | | | | | |

Totals 79 79

11 **Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?**

12a **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.

12b 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.

12c **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.

12d **Enter the transferred loss amount included in gross income as required under section 91 u $**

13 **Did the transferor transfer property described in section 367(d)(4)?**

If "No," skip Section C and questions 14a through 15.

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

Form 926 (Rev. 11-2018)
14a  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?  

   [ ] Yes  [ ] No

c  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) u $  

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

---

Supplemental Part III Information Required To Be Reported (see instructions)

---

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 ________%  (b) After ________%

17  Type of nonrecognition transaction (see instructions)  

   [ ] IRC SECTION 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)  

      [ ] Yes  [ ] No

   b  Gain recognition under section 904(f)(5)(F)  

      [ ] Yes  [ ] No

   c  Recapture under section 1503(d)  

      [ ] Yes  [ ] No

   d  Exchange gain under section 987  

      [ ] Yes  [ ] No

19  Did this transfer result from a change in entity classification?  

      [ ] Yes  [ ] No

20a  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions  

      [ ] Yes  [ ] 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) u $  

      [ ] Yes  [ ] No

   c  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 covered by section 367(e)(1)? See instructions  

      [ ] Yes  [ ] No
Form 926
Department of the Treasury
Internal Revenue Service

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

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

THE SAINT PAUL FOUNDATION

Identifying number

41–6031510

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? Yes 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 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).

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</tr>
</tbody>
</table>

If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? Yes No
If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation

EIN of parent corporation

b Have basis adjustments under section 367(a)(4) been made? Yes 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.
   a List the name and EIN of the transferor's partnership.

Name of partnership

EIN of partnership

ADAMS STREET PARTNERSHIP FUND

26–1268649

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 No
   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)

BCPE BREEZE CAYMAN HIRONO, LLC

5a Identifying number, if any

5b Reference ID number (see instructions)

b X

6 Address (including country)

UGLAND HOUSE, SOUTH CHURCH STREET

GEORGE TOWN CJ KY1-1104 CAYMAN ISLANDS

CJ

7 Country code of country of incorporation or organization (see instructions)

8 Foreign law characterization (see instructions)

CAYMAN CORPORATION

9 Is the transferee foreign corporation a controlled foreign corporation? Yes No

For Paperwork Reduction Act Notice, see separate instructions.

Form 926 (Rev. 11-2018)
### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? [ ] Yes [ ] No

If "Yes," skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>142</td>
<td>142</td>
<td></td>
</tr>
<tr>
<td>Other property</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals: **142 142**

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? [ ] Yes [ ] No

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? [ ] Yes [ ] No

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? [ ] Yes [ ] No

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 911: $ 

13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

If "No," skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

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Form 926 (Rev. 11-2018)
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  ________ %  (b) After   ________ %

17  Type of nonrecognition transaction (see instructions)  u IRC SECTION 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)  Yes  X  No
    b  Gain recognition under section 904(f)(5)(F)  Yes  X  No
    c  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

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
    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)  u $ __________
    c 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  X  No

21  Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation
    covered by section 367(e)(1)? See instructions  Yes  X  No

Form 926 (Rev. 11-2018)  DAA
Return by a U.S. Transferor of Property to a Foreign Corporation

Part I U.S. Transferor Information (see instructions)

Name of transferor

THE SAINT PAUL FOUNDATION

Identifying number

41–6031510

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? ☐ Yes ☑ 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 ☑ 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

      Identifying number

      Name of parent corporation

      EIN of parent corporation

   If not, list the name and employer identification number (EIN) of the parent corporation.

   c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? ☐ Yes ☑ No

         If not, list the name and employer identification number (EIN) of the parent corporation.

   d Have basis adjustments under section 367(a)(4) been made? ☐ Yes ☑ 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.

   a List the name and EIN of the transferor’s partnership.

      Name of partnership

      EIN of partnership

      ADAMS STREET PARTNERSHIP FUND 26–1268649

         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 ☐ No

         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)

   BCPE BREEZE CAYMAN NOHEJI, LLC

5a Identifying number, if any

5b Reference ID number (see instructions)

   BCPENOHEJI

6 Address (including country)

   UGLAND HOUSE, SOUTH CHURCH STREET

   GEORGE TOWN CJ KY1–1104 CAYMAN ISLANDS

7 Country code of country of incorporation or organization (see instructions)

   CJ

8 Foreign law characterization (see instructions)

   CORPORATION

9 Is the transferee foreign corporation a controlled foreign corporation? ☐ Yes ☑ No

For Paperwork Reduction Act Notice, see separate instructions.
### Part III  Information Regarding Transfer of Property

**Section A—Cash**

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  

☐ Yes  ☒ No

---

**Section B—Other Property (other than intangible property subject to section 367(d))**

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>316</td>
<td>316</td>
<td></td>
</tr>
<tr>
<td>Other property</td>
<td>(not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals  

|                                                | 316 | 316 |

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11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  

☐ Yes  ☒ No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  

☐ Yes  ☒ No

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,” go to line 12b.  

☐ Yes  ☒ No

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 12c. If “No,” skip lines 12c and 12d, and go to line 13.  

☐ Yes  ☒ No

d Enter the transferred loss amount included in gross income as required under section 91 | $ |

13 Did the transferor transfer property described in section 367(d)(4)?  

If “No,” skip Section C and questions 14a through 15.  

☐ Yes  ☒ No

---

**Section C—Intangible Property Subject to Section 367(d)**

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
</table>
**Additional Information Regarding Transfer of Property** (see instructions)

14a 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 [X]  

b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  
   Yes [ ] No [X]  

c 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 [X]  

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 [X]  

**Supplemental Part III Information Required To Be Reported** (see instructions)

**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 _________ %  (b) After _________ %  

17 Type of nonrecognition transaction (see instructions) X IRC SECTION 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) X Yes [ ] No [X]  

   b Gain recognition under section 904(f)(5)(F) X Yes [ ] No [X]  

   c Recapture under section 1503(d) X Yes [ ] No [X]  

   d Exchange gain under section 987 X Yes [ ] No [X]  

19 Did this transfer result from a change in entity classification?  
   Yes [ ] No [X]  

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions  
   Yes [ ] No [X]  

   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) $ .  

   c 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 [X]  

21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  
   Yes [ ] No [X]
PART I  U.S. TRANSFEROR INFORMATION

THE SAINT PAUL FOUNDATION

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? ☐ Yes ☒ 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 ☒ 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
   Identifying number

   c. If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? ☐ Yes ☒ No
      If not, list the name and employer identification number (EIN) of the parent corporation.

   Name of parent corporation
   EIN of parent corporation

   d. Have basis adjustments under section 367(a)(4) been made? ☐ Yes ☒ 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.
   a. List the name and EIN of the transferor’s partnership.

   Name of partnership
   EIN of partnership

ADAMS STREET PARTNERSHIP FUND

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 ☐ No

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

4. Name of transferee (foreign corporation)
   BCPE BREEZE CAYMAN SANMORI, LLC

5a. Identifying number, if any

6. Address (including country)
   UGLAND HOUSE, SOUTH CHURCH STREET
   GEORGE TOWN
   KY1-1104
   CAYMAN ISLANDS

5b. Reference ID number (see instructions)
   BCPESANMORI

7. Country code of country of incorporation or organization (see instructions)
   CJ

8. Foreign law characterization (see instructions)
   CORPORATION

9. Is the transferee foreign corporation a controlled foreign corporation? ☐ Yes ☒ No

For Paperwork Reduction Act Notice, see separate instructions.
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? ☐ Yes ☒ No

If "Yes," skip the remainder of Part III and go to Part IV.

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19 PARTNERSHIP INTEREST</td>
<td>116</td>
<td>116</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
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<td></td>
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<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>116</td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? ☐ Yes ☒ No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? ☐ Yes ☒ No

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? ☐ Yes ☐ No

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? ☐ Yes ☐ No

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 u $ ____________________ ☐ Yes ☒ No

13 Did the transferor transfer property described in section 367(d)(4)? ☐ Yes ☒ No

If "No," skip Section C and questions 14a through 15.

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

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DAA
**Part IV**  Additional Information Regarding Transfer of Property  (see instructions)

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>14a</td>
<td>Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?</td>
</tr>
<tr>
<td>14b</td>
<td>At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?</td>
</tr>
<tr>
<td>14c</td>
<td>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?</td>
</tr>
<tr>
<td>14d</td>
<td>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) u $</td>
</tr>
<tr>
<td>15</td>
<td>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)?</td>
</tr>
</tbody>
</table>

**Supplemental Part III Information Required To Be Reported**  (see instructions)

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>16</td>
<td>Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.</td>
</tr>
<tr>
<td></td>
<td>(a) Before __________ %  (b) After __________ %</td>
</tr>
<tr>
<td>17</td>
<td>Type of nonrecognition transaction (see instructions) u IRC SECTION 351</td>
</tr>
<tr>
<td>18</td>
<td>Indicate whether any transfer reported in Part III is subject to any of the following.</td>
</tr>
<tr>
<td>19</td>
<td>Did this transfer result from a change in entity classification?</td>
</tr>
<tr>
<td>20a</td>
<td>Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions</td>
</tr>
<tr>
<td></td>
<td>If “Yes,” complete lines 20b and 20c.</td>
</tr>
<tr>
<td>20b</td>
<td>Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) u $</td>
</tr>
<tr>
<td>20c</td>
<td>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)?</td>
</tr>
<tr>
<td>21</td>
<td>Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions</td>
</tr>
</tbody>
</table>
**Part I  U.S. Transferor Information**  
(see instructions)

<table>
<thead>
<tr>
<th>Name of transferor</th>
<th>Identifying number (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>THE SAINT PAUL FOUNDATION</td>
<td>41–6031510</td>
</tr>
</tbody>
</table>

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.
   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? [ ] Yes [x] No

   If not, list the controlling shareholder(s) and their identifying number(s).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
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</tr>
</tbody>
</table>

| 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.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tr>
</tbody>
</table>

| 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 section 367), complete questions 3a through 3d.
   a. List the name and EIN of the transferor's partnership.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADAMS STREET PARTNERSHIP FUND</td>
<td>26–1268649</td>
</tr>
</tbody>
</table>

| b. Did the partner pick up its pro rata share of gain on the transfer of partnership assets? [ ] Yes [x] 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 established securities market? [ ] Yes [x] No

**Part II  Transferee Foreign Corporation Information**  
(see instructions)

<table>
<thead>
<tr>
<th>Name of transferee (foreign corporation)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>BCPE BREEZE CAYMAN TANOHATA, LLC</td>
<td></td>
</tr>
</tbody>
</table>

6. Address (including country)

   UGLAND HOUSE, SOUTH CHURCH STREET
   GEORGE TOWN  CJ  KY1–1104  CAYMAN ISLANDS

7. Country code of country of incorporation or organization (see instructions)

<table>
<thead>
<tr>
<th>CD</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>CJ</td>
<td></td>
</tr>
</tbody>
</table>

8. Foreign law characterization (see instructions)

<table>
<thead>
<tr>
<th>CORPORATION</th>
<th></th>
</tr>
</thead>
</table>

9. Is the transferee foreign corporation a controlled foreign corporation? [ ] Yes [x] No

Go to www.irs.gov/Form926 for instructions and the latest information.
### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
   If "Yes," skip the remainder of Part III and go to Part IV.  
   
   
   
   Yes  
   No

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| Inventory                   | 03/31/19  
PARTNERSHIP INTEREST  
39  
39 |                      |                            |                                         |                        |                               |

Other property  
(not listed under another category)

| Property with built-in loss |                      |                            |                                         |                        |                               |
| Totals                     | 39  
39 |                      |                            |                                         |                        |                               |

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
   Yes  
   No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
   Yes  
   No

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?  
   Yes  
   No

   If "Yes," go to line 12b.

   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?  
   Yes  
   No

   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 u $  
   Yes  
   No

13 Did the transferor transfer property described in section 367(d)(4)?  
   If "No," skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

DAA
14a 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? ................................................................. Yes ☐ No ☐

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? ................................................................. 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)(i) $ .................................................................

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 ☐

Supplemental Part III Information Required To Be Reported (see instructions)

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 ______ %  (b) After ______ %

17 Type of nonrecognition transaction (see instructions) u IRC SECTION 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) ................................................................. Yes ☐ No ☐

b Gain recognition under section 904(f)(5)(F) ................................................................. Yes ☐ No ☐

c Recapture under section 1503(d) ................................................................. Yes ☐ No ☐

d Exchange gain under section 987 ................................................................. Yes ☐ No ☐

19 Did this transfer result from a change in entity classification? ................................................................. Yes ☐ No ☐

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions 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) $ .................................................................

c 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 covered by section 367(e)(1)? See instructions ................................................................. Yes ☐ No ☐
Form 926
(Rev. November 2018)
Department of the Treasury
Internal Revenue Service

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

u 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.

Part I U.S. Transferor Information (see instructions)

Name of transferor

THE SAINT PAUL FOUNDATION

Identifying number (see instructions)

41–6031510

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? □ Yes □ 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 □ 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

Identifying number


   c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? □ Yes □ No
      If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation

EIN of parent corporation


   d Have basis adjustments under section 367(a)(4) been made? □ Yes □ 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.
   a List the name and EIN of the transferor’s partnership.

Name of partnership

EIN of partnership

ADAMS STREET PARTNERSHIP FUND

26–1268649

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 □ No

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)

Name of transferee (foreign corporation)

BCPE BREEZE CAYMAN TSUKIKOSHIGENYA

Identifying number, if any

5a

Address (including country)

UGLAND HOUSE, SOUTH CHURCH STREET

GEORGE TOWN

CAYMAN ISLANDS

CJ

Country code of country of incorporation or organization (see instructions)

CJ

Foreign law characterization (see instructions)

CORPORATION

5b Reference ID number (see instructions)

BCPETSUKIKOSHIGENYA

Is the transferee foreign corporation a controlled foreign corporation? □ Yes □ No

For Paperwork Reduction Act Notice, see separate instructions.
### Section A—Cash

<table>
<thead>
<tr>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Cost or other basis</th>
<th>(d) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Cash</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? ☐ Yes ☒ No

If "Yes," skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Cost or other basis</th>
<th>(d) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Stock and securities</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Inventory</strong></td>
<td>03/31/19 PARTNERSHIP INTEREST</td>
<td>180</td>
<td>180</td>
</tr>
<tr>
<td><strong>Other property (not listed under another category)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Property with built-in loss</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td></td>
<td>180</td>
<td>180</td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? ☐ Yes ☒ No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? ☐ Yes ☒ No

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? ☐ Yes ☒ No

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? ☐ Yes ☒ No

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 u $ __________

13 Did the transferor transfer property described in section 367(d)(4)? ☐ Yes ☒ No

If "No," skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Cost or other basis</th>
<th>(d) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Property described in sec. 367(d)(4)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

12 Did the transferor transfer property described in section 367(d)(4)? ☒ Yes ☐ No

If "No," skip Section C and questions 14a through 15.
14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

c 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?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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) u $  

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
</table>

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)?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Supplemental Part III Information Required To Be Reported (see instructions)

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.  

<table>
<thead>
<tr>
<th>(a) Before</th>
<th>(b) After</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>%</td>
</tr>
</tbody>
</table>

17 Type of nonrecognition transaction (see instructions) u IRC SECTION 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) |
|   | Yes x No |
| b | Gain recognition under section 904(f)(5)(F) |
|   | Yes x No |
| c | 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?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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) u $  |
|   | Yes | No |
| c | 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 covered by section 367(e)(1)? See instructions  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Return by a U.S. Transferor of Property to a Foreign Corporation

Part I  U.S. Transferor Information (see instructions)

Name of transferor
THE SAINT PAUL FOUNDATION
Identifying number 41-6031510

1  Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  Yes ☐ 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 ☐ 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

   Identifying number

   b

   c  If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?  Yes ☐ No ☒
      If not, list the name and employer identification number (EIN) of the parent corporation.

   Name of parent corporation

   EIN of parent corporation

   d  Have basis adjustments under section 367(a)(4) been made?  Yes ☐ 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.
   a  List the name and EIN of the transferor’s partnership.

   Name of partnership

   EIN of partnership

ADAMS STREET PARTNERSHIP FUND 26-1268649

   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 ☒ No ☐
   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)
   BCPE BREEZE CAYMAN UKUJIMA, LLC

5a  Identifying number, if any

5b  Reference ID number (see instructions)

Address (including country)
UGLAND HOUSE, SOUTH CHURCH STREET
GEORGE TOWN, CJ KY1-1104 CAYMAN ISLANDS

Country code of country of incorporation or organization (see instructions)
CJ

7  Is the transferee foreign corporation a controlled foreign corporation?  Yes ☐ No ☒

For Paperwork Reduction Act Notice, see separate instructions.
### Part III: Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
If “Yes,” skip the remainder of Part III and go to Part IV.  
Yes [x] No

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>309</td>
<td>309</td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals  

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
Yes [x] No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
Yes [x] No

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?  
Yes [x] No

c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?  
Yes [x] No

d Enter the transferred loss amount included in gross income as required under section 91 u $  
Yes [x] No

13 Did the transferor transfer property described in section 367(d)(4)?  
Yes [x] No

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm’s length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

Form 926 (Rev. 11-2018)
14a 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? ☐ Yes ☐ No

c 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

**Supplemental Part III Information Required To Be Reported (see instructions)**

---

**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 __________%  (b) After __________%  **IRC SECTION 351**

17 Type of nonrecognition transaction (see instructions) ☐ IRC SECTION 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) ☐ Yes ☐ No

b Gain recognition under section 904(f)(5)(F) ☐ Yes ☐ No

c Recapture under section 1503(d) ☐ Yes ☐ No

d Exchange gain under section 987 ☐ Yes ☐ No

19 Did this transfer result from a change in entity classification? ☐ Yes ☐ No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions.

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) $ __________.

c 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 covered by section 367(e)(1)? See instructions. ☐ Yes ☐ No
**Part I  U.S. Transferor Information (see instructions)**

Name of transferor: **THE SAINT PAUL FOUNDATION**

Identifying number: 41-6031510

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Is the transferee a specified 10%-owned foreign corporation?</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>2 If the transferor was a corporation, complete questions 2a through 2d.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>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?</td>
<td></td>
<td>No</td>
</tr>
<tr>
<td>b Did the transferor remain in existence after the transfer?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>If not, list the controlling shareholder(s) and their identifying number(s).</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>If not, list the name and employer identification number (EIN) of the parent corporation.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
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<tr>
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<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Have basis adjustments under section 367(a)(4) been made?</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>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.</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>a List the name and EIN of the transferor's partnership.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADAMS STREET PARTNERSHIP FUND</td>
<td>26-1268649</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Did the partner pick up its pro rata share of gain on the transfer of partnership assets?</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is the partner disposing of its entire interest in the partnership?</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market?</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

**Part II  Transferee Foreign Corporation Information (see instructions)**

Name of transferee (foreign corporation): **BCPE BREEZE CAYMAN YOKOHAMA, LLC**

<table>
<thead>
<tr>
<th>Address (including country)</th>
<th>Country code of country of incorporation or organization (see instructions)</th>
<th>Foreign law characterization (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>UGLAND HOUSE, SOUTH CHURCH STREET</td>
<td>CAYMAN ISLANDS</td>
<td>CORPORATION</td>
</tr>
<tr>
<td>GEORGE TOWN</td>
<td>CJ</td>
<td>BCPEYOKOHAMA</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Is the transferee foreign corporation a controlled foreign corporation?</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

For Paperwork Reduction Act Notice, see separate instructions.
### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? □ Yes □ No

If “Yes,” skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>726</td>
<td>726</td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Property with built-in loss

Totals 726 726

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? □ Yes □ No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? □ Yes □ No

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? □ Yes □ No

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? □ Yes □ No

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 u $ □ Yes □ No

If “No,” skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

Form 926 (Rev. 11-2018)
14a 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? 
   □ Yes □ No

c 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

Supplemental Part III Information Required To Be Reported (see instructions)

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 % (b) After %

17 Type of nonrecognition transaction (see instructions) IRC SECTION 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 1503(d) 
   d Exchange gain under section 987 
   e Gain recognition under section 904(f)(6) 
   □ Yes □ No

19 Did this transfer result from a change in entity classification? 
   □ Yes □ No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions 
   □ Yes □ 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) $ 
   c 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 covered by section 367(e)(1)? See instructions 
   □ Yes □ No

Form 926 (Rev. 11-2018)

THE SAINT PAUL FOUNDATION 41-6031510

Page 3

DAA
Form 926  
(Return by a U.S. Transferor of Property  
to a Foreign Corporation  
(Rev. November 2018))

Part I  U.S. Transferor Information (see instructions)

Name of transferor

THE SAINT PAUL FOUNDATION  41–6031510

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? ☐ Yes ☒ 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 ☐ 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  Identifying number

ccc If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? ☐ Yes ☐ No

If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation  EIN of parent corporation

ccc Have basis adjustments under section 367(a)(4) been made? ☐ Yes ☐ 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.

a List the name and EIN of the transferor’s partnership.

Name of partnership  EIN of partnership

ADAMS STREET PARTNERSHIP FUND  26–1268649

b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? ☐ Yes ☒ No

cc Is the partner disposing of its entire 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

Part II  Transferee Foreign Corporation Information (see instructions)

4 Name of transferee (foreign corporation)

MELTWATER HOLDING B.V.

5a Identifying number, if any

5b Reference ID number (see instructions)

6 Address (including country)

SINGEL 250  NOORD–HOLAND

AMSTERDAM  NL 1016AB  NETHERLANDS

7 Country code of country of incorporation or organization (see instructions)

NL

8 Foreign law characterization (see instructions)

CORPORATION

9 Is the transferee foreign corporation a controlled foreign corporation? ☐ Yes ☒ No

For Paperwork Reduction Act Notice, see separate instructions.

DAA

Attachment Sequence No. 128

OMB No. 1545-0026
### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
If "Yes," skip the remainder of Part III and go to Part IV.  
[ ] Yes [ ] No

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
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<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/01/19 LOAN/ACCRUED INTEREST</td>
<td>159</td>
<td>159</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td>159</td>
<td>159</td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
[ ] Yes [ ] No

12a 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.  
[ ] Yes [ ] No

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.  
[ ] Yes [ ] No

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.  
[ ] Yes [ ] No

d Enter the transferred loss amount included in gross income as required under section 91 u $  
[ ] Yes [ ] No

13 Did the transferor transfer property described in section 367(d)(4)?  
If "No," skip Section C and questions 14a through 15.  
[ ] Yes [ ] No

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals | | | | | | |
Part IV  Additional Information Regarding Transfer of Property (see instructions)

14a  Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  

   (a) Yes  (b) No

b  At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  

   (a) Yes  (b) No

c  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?  

   (a) Yes  (b) 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)?  

   (a) Yes  (b) No

Supplemental Part III Information Required To Be Reported (see instructions)

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 _________  %  (b) After _________  %

17  Type of nonrecognition transaction (see instructions)  

   IRC SECTION 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)  

      (a) Yes  (b) No

   b  Gain recognition under section 904(f)(5)(F)  

      (a) Yes  (b) No

   c  Recapture under section 1503(d)  

      (a) Yes  (b) No

   d  Exchange gain under section 987  

      (a) Yes  (b) No

19  Did this transfer result from a change in entity classification?  

   (a) Yes  (b) No

20a  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions  

      If “Yes,” complete lines 20b and 20c.

   (a) Yes  (b) No

   b  Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) $ 

   (a) Yes  (b) No

   c  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)?  

      (a) Yes  (b) No

21  Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  

      (a) Yes  (b) No
Part I  U.S. Transferor Information (see instructions)

Name of transferor

THE SAINT PAUL FOUNDATION

Identifying number (see instructions)

41–6031510

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  
   Yes  No  X

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  No  X
   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  Identifying number

   c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?  
      Yes  No
   If not, list the name and employer identification number (EIN) of the parent corporation.

         Name of parent corporation  EIN of parent corporation

   d Have basis adjustments under section 367(a)(4) been made?  
      Yes  No  X

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.
   a List the name and EIN of the transferor’s partnership.

         Name of partnership  EIN of partnership

ADAMS STREET PARTNERSHIP FUND

Identifying number (see instructions)

26–1268649

   b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?  
      Yes  X  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 established securities market?  
      Yes  X  No

Part II  Transferee Foreign Corporation Information (see instructions)

4 Name of transferee (foreign corporation)

MONT BLANC BRANDS HOLDINGS S.A.R.L.

Identifying number, if any

5a

6 Address (including country)

7 RUE LOU HEMMER

LU L–1748 LUXEMBOURG

5b Reference ID number (see instructions)

MONTBLANCBRANDS

7 Country code of country of incorporation or organization (see instructions)

LU

8 Foreign law characterization (see instructions)

CORPORATION

9 Is the transferee foreign corporation a controlled foreign corporation?  
   Yes  X  No
## Part III Information Regarding Transfer of Property (see instructions)

### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**10** Was cash the only property transferred?  
If "Yes," skip the remainder of Part III and go to Part IV.  
No ♦ Yes **X No**

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
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<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>PROPERTY</td>
<td>770</td>
<td>770</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
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<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
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<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>770</td>
</tr>
</tbody>
</table>

**11** Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
No ♦ Yes **X No**

**12a** 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.  
No ♦ Yes **X No**

**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.  
No ♦ Yes **X No**

**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.  
No ♦ Yes **X No**

**d** Enter the transferred loss amount included in gross income as required under section 91 u $  
No ♦ Yes **X No**

**13** Did the transferor transfer property described in section 367(d)(4)?  
If "No," skip Section C and questions 14a through 15.  
No ♦ Yes **X No**

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
### Part IV Additional Information Regarding Transfer of Property (see instructions)

<table>
<thead>
<tr>
<th>Line</th>
<th>Description</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>14a</td>
<td>Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>b</td>
<td>At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>c</td>
<td>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?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>d</td>
<td>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) u $</td>
<td></td>
<td></td>
</tr>
<tr>
<td>15</td>
<td>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)?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Supplemental Part III Information Required To Be Reported**

(see instructions)

---

**Part IV Additional Information Regarding Transfer of Property (see instructions)**

<table>
<thead>
<tr>
<th>Line</th>
<th>Description</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>16</td>
<td>Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>(a) Before ________ %  (b) After ________ %</td>
<td></td>
<td></td>
</tr>
<tr>
<td>17</td>
<td>Type of nonrecognition transaction (see instructions) u IRC SECTION 351</td>
<td></td>
<td></td>
</tr>
<tr>
<td>18</td>
<td>Indicate whether any transfer reported in Part III is subject to any of the following.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>a</td>
<td>Gain recognition under section 904(f)(3)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>b</td>
<td>Gain recognition under section 904(f)(5)(F)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>c</td>
<td>Recapture under section 1503(d)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>d</td>
<td>Exchange gain under section 987</td>
<td></td>
<td></td>
</tr>
<tr>
<td>19</td>
<td>Did this transfer result from a change in entity classification?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>20a</td>
<td>Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>If “Yes,” complete lines 20b and 20c.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>b</td>
<td>Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) u $</td>
<td></td>
<td></td>
</tr>
<tr>
<td>c</td>
<td>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)?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>21</td>
<td>Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
## Part I U.S. Transferor Information (see instructions)

### Name of transferor

THE SAINT PAUL FOUNDATION

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>2a</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>2b</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>2c</td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>

### Controlling shareholder

<table>
<thead>
<tr>
<th>Shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Name of parent corporation

<table>
<thead>
<tr>
<th>Corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Name of partnership

ADAMS STREET PARTNERSHIP FUND

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Transferee Foreign Corporation Information (see instructions)

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>4</td>
<td></td>
<td>X</td>
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<td>6</td>
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<td>X</td>
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<td>7</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>8</td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>

### Identifying number

THE SAINT PAUL FOUNDATION 41–6031510

## Part II Transferee Foreign Corporation Information (see instructions)

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>5a</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>5b</td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>

### Name of transferee (foreign corporation)

9326–3051 QUEBEC INC

<table>
<thead>
<tr>
<th>Name of transferee</th>
<th>Identifying number, if any</th>
<th>Reference ID number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>98–1292090</td>
<td></td>
</tr>
</tbody>
</table>

### Address (including country)

1155 RENE LEVESQUE BLVD. WEST QUEBEC MONTREAL CA H3B 3V2 CANADA

<table>
<thead>
<tr>
<th>Address</th>
<th>Country code</th>
</tr>
</thead>
<tbody>
<tr>
<td>1155 RENE LEVESQUE BLVD. WEST QUEBEC MONTREAL CA</td>
<td>H3B 3V2 CANADA</td>
</tr>
</tbody>
</table>

### Country code of country of incorporation or organization

<table>
<thead>
<tr>
<th>Country code</th>
</tr>
</thead>
<tbody>
<tr>
<td>CA</td>
</tr>
</tbody>
</table>

### Foreign law characterization

COMPANY

<table>
<thead>
<tr>
<th>Foreign law characterization</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>
### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
If “Yes,” skip the remainder of Part III and go to Part IV.  

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>06/25/19</td>
<td>FOREIGN CURRENCY</td>
<td>10</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  

12a 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 911. $  

13 Did the transferor transfer property described in section 367(d)(4)?  
If “No,” skip Section C and questions 14a through 15.  

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm’s length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals | | | | | | |

Form 926 (Rev. 11-2018)
Part IV  Additional Information Regarding Transfer of Property (see instructions)

14a  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? ☐ Yes ☐ No

c  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

Supplemental Part III Information Required To Be Reported (see instructions)

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 __________ % (b) After __________ %

17  Type of nonrecognition transaction (see instructions) ☐ IRC SECTION 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) ☐ Yes ☐ No

b  Gain recognition under section 904(f)(5)(F) ☐ Yes ☐ No

c  Recapture under section 1503(d) ☐ Yes ☐ No

d  Exchange gain under section 987 ☐ Yes ☐ No

19  Did this transfer result from a change in entity classification? ☐ Yes ☐ No

20a  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions ☐ Yes ☐ 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) $ __________

c  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 covered by section 367(e)(1)? See instructions ☐ Yes ☐ No
### Part I  U.S. Transferor Information (see instructions)

**Name of transferor**

<table>
<thead>
<tr>
<th>THE SAINT PAUL FOUNDATION</th>
<th>Identifying number (41-6031510)</th>
</tr>
</thead>
</table>

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.
   - 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 [ ] No
   - b) Did the transferor remain in existence after the transfer? [ ] Yes [X] No

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<tr>
<td></td>
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</tr>
</tbody>
</table>

If not, list the controlling shareholder(s) and their identifying number(s).

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? [ ] Yes [X] No

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

c) If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), list the name and EIN of the transferor's partnership.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<td></td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Part II  Transferee Foreign Corporation Information (see instructions)

4. Name of transferee (foreign corporation)

<table>
<thead>
<tr>
<th>ANOKION SA</th>
</tr>
</thead>
</table>

5a. Identifying number, if any

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
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<td></td>
</tr>
</tbody>
</table>

5b. Reference ID number (see instructions)

<table>
<thead>
<tr>
<th>ANOKION</th>
</tr>
</thead>
</table>

6. Address (including country)

<table>
<thead>
<tr>
<th>EN RUCHOZ, CH. DE LA DENT D'OCHE 1A</th>
<th>ECUBLENS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>SZ CH-1024 SWITZERLAND</td>
</tr>
</tbody>
</table>

7. Country code of country of incorporation or organization (see instructions)

| SZ |

8. Foreign law characterization (see instructions)

<table>
<thead>
<tr>
<th>CORPORATION</th>
</tr>
</thead>
</table>

9. Is the transferee foreign corporation a controlled foreign corporation? [ ] Yes [X] No

Form 926 (Rev. 11-2018)
### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>Date of transfer</th>
<th>Description of property</th>
<th>Fair market value on date of transfer</th>
<th>Cost or other basis</th>
<th>Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td>07/11/19</td>
<td></td>
<td>325</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10  Was cash the only property transferred?  
   
   If "Yes," skip the remainder of Part III and go to Part IV.  

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>Date of transfer</th>
<th>Description of property</th>
<th>Fair market value on date of transfer</th>
<th>Cost or other basis</th>
<th>Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>06/06/19</td>
<td>COMMON &amp; PREFERRED STOCK</td>
<td>472</td>
<td>472</td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
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<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
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<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>472</td>
</tr>
</tbody>
</table>

11  Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
   
   If "Yes," go to line 12a.  

12a  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.  

12b  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.  

12c  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.  

12d  Enter the transferred loss amount included in gross income as required under section 911.  

13  Did the transferor transfer property described in section 367(d)(4)?  
   
   If "No," skip Section C and questions 14a through 15.  

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>Date of transfer</th>
<th>Description of property</th>
<th>Useful life</th>
<th>Arm's length price on date of transfer</th>
<th>Cost or other basis</th>
<th>Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

Form 926 (Rev. 11-2018)
14a 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? ☐ Yes ☐ No

c 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

Supplemental Part III Information Required To Be Reported (see instructions)

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 ________% (b) After ________%

17 Type of nonrecognition transaction (see instructions) ☐ IRC SECTION 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) ☐ Yes ☐ No
   b Gain recognition under section 904(f)(5)(F) ☐ Yes ☐ No
   c Recapture under section 1503(d) ☐ Yes ☐ No
   d Exchange gain under section 987 ☐ Yes ☐ No

19 Did this transfer result from a change in entity classification? ☐ Yes ☐ No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions ☐ Yes ☐ 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) ☐ $

c 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 covered by section 367(e)(1)? See instructions ☐ Yes ☐ No
Form 926
Return by a U.S. Transferor of Property
to a Foreign Corporation

Part I  U.S. Transferor Information

THE SAINT PAUL FOUNDATION

1  Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  Yes  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  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

Identifying number

   If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?  Yes  No

      If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation

EIN of parent corporation

   Have basis adjustments under section 367(a)(4) been made?  Yes  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.

   a  List the name and EIN of the transferor's partnership.

Name of partnership

EIN of partnership

   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  No

   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

4  Name of transferee (foreign corporation)

   CLOVERDELL INVESTMENT LTD

5a  Identifying number, if any

   98-1041815

   Reference ID number

5b  (see instructions)

6  Address (including country)

   8TH FLOOR, NEWTON TOWER

   PORT LOUIS MP  MAURITIUS

7  Country code of country of incorporation or organization (see instructions)

   MP

8  Foreign law characterization (see instructions)

   CORPORATION

9  Is the transferee foreign corporation a controlled foreign corporation?  Yes  No

For Paperwork Reduction Act Notice, see separate instructions.

DAA
Part III  Information Regarding Transfer of Property (see instructions)

Section A—Cash

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
<th>(c) Description of property</th>
<th>(d) Fair market value on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? ☐ Yes ☑ No

If "Yes," skip the remainder of Part III and go to Part IV.

Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
<th>(c) Description of property</th>
<th>(d) Fair market value on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>07/12/19</td>
<td>STOCKS &amp; SECURITIES</td>
<td>672</td>
<td>672</td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>672</td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? ☐ Yes ☑ No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? ☐ Yes ☑ No

If "Yes," go to line 12b.

12b 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? ☐ Yes ☑ No

If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.

12c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? ☐ Yes ☑ No

If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.

12d Enter the transferred loss amount included in gross income as required under section 91 u $ __________

13 Did the transferor transfer property described in section 367(d)(4)? ☐ Yes ☑ No

If "No," skip Section C and questions 14a through 15.

Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
<th>(c) Description of property</th>
<th>(d) Useful life</th>
<th>(e) Arm's length price on date of transfer</th>
<th>(f) Cost or other basis</th>
<th>(g) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

DAA
**Part IV  Additional Information Regarding Transfer of Property (see instructions)**

14a 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? 

   ![Yes/No]

c 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) u $ 

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]

---

**Supplemental Part III Information Required To Be Reported (see instructions)**

---

**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 % (b) After % 

17 Type of nonrecognition transaction (see instructions) u IRC SECTION 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) 

   ![Yes/No]

   b Gain recognition under section 904(f)(5)(F) 

   ![Yes/No]

   c Recapture under section 1503(d) 

   ![Yes/No]

   d Exchange gain under section 987 

   ![Yes/No]

19 Did this transfer result from a change in entity classification? 

   ![Yes/No]

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. 

   ![Yes/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) u $ 

   ![Yes/No]

   c 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 covered by section 367(e)(1)? See instructions. 

   ![Yes/No]
Return by a U.S. Transferor of Property to a Foreign Corporation

Part I  U.S. Transferor Information

Name of transferor

THE SAINT PAUL FOUNDATION

Identifying number (see instructions)

41–6031510

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? ☐ Yes ☒ 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 transferee controlled (under section 368(c)) by five or fewer domestic corporations? ☐ Yes ☒ 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

Identifying number

Name of parent corporation

EIN of parent corporation

c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? ☐ Yes ☒ No

If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation

EIN of parent corporation

d Have basis adjustments under section 367(a)(4) been made? ☐ Yes ☒ 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.

a List the name and EIN of the transferor’s partnership.

Name of partnership

EIN of partnership

ADAMS STREET PARTNERSHIP FUND

26–1268403

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 ☒ No

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

Name of transferee (foreign corporation)

NAPSBURY LIMITED

5a Identifying number, if any

5b Reference ID number (see instructions)

NAPSBURY

Address (including country)

COURTLANDS, PARKLANDS AVENUE, WEST SUSSEX UK BN12 4NG GREAT BRITAIN (UK)

Country code of country of incorporation or organization (see instructions)

UK

Foreign law characterization (see instructions)

CORPORATION

Is the transferee foreign corporation a controlled foreign corporation? ☐ Yes ☒ No

For Paperwork Reduction Act Notice, see separate instructions.

Form 926 (Rev. 11-2018)
### Part III Information Regarding Transfer of Property

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>Date of transfer</th>
<th>Description of property</th>
<th>Fair market value on date of transfer</th>
<th>Cost or other basis</th>
<th>Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td>03/31/19</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
☐ Yes ☒ No

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>Date of transfer</th>
<th>Description of property</th>
<th>Fair market value on date of transfer</th>
<th>Cost or other basis</th>
<th>Gain recognized on transfer</th>
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<td>162</td>
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</tr>
<tr>
<td>Inventory</td>
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<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
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</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>162 162</td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
☐ Yes ☒ No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
☐ Yes ☒ No

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?  
☐ Yes ☒ No

c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?  
☐ Yes ☒ No

d Enter the transferred loss amount included in gross income as required under section 91 u $ ________________________  
☐ Yes ☒ No

13 Did the transferor transfer property described in section 367(d)(4)?  
☐ Yes ☒ No

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>Date of transfer</th>
<th>Description of property</th>
<th>Useful life</th>
<th>Arm's length price on date of transfer</th>
<th>Cost or other basis</th>
<th>Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

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**Form 926 (Rev. 11-2018)**

THE SAINT PAUL FOUNDATION 41-6031510

THE SAINT PAUL FOUNDATION 41-6031510

DAA
Part IV  Additional Information Regarding Transfer of Property (see instructions)

14a  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?  ☐ Yes ☐ No

c  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) u $ __________

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

Supplemental Part III Information Required To Be Reported (see instructions)

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 %  (b) After %

17  Type of nonrecognition transaction (see instructions) u IRC SECTION 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) ☐ Yes ☐ No

b  Gain recognition under section 904(f)(5)(F) ☐ Yes ☐ No

c  Recapture under section 1503(d) ☐ Yes ☐ No

d  Exchange gain under section 987 ☐ Yes ☐ No

19  Did this transfer result from a change in entity classification?  ☐ Yes ☐ No

20a  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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) u $ __________

c  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 covered by section 367(e)(1)? See instructions  ☐ Yes ☐ No
Form 926
(Rev. November 2018)
Department of the Treasury
Internal Revenue Service

Part I  U.S. Transferor Information (see instructions)

Name of transferor
THE SAINT PAUL FOUNDATION

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? ☐ Yes ☑ 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 ☑ 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

   Identifying number

   Yes
   Yes
   No
   No

   c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? ☐ Yes ☑ No
   If not, list the name and employer identification number (EIN) of the parent corporation.

   Name of parent corporation

   EIN of parent corporation

   Yes
   Yes
   No
   No

   d Have basis adjustments under section 367(a)(4) been made? ☐ Yes ☑ 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.

   a List the name and EIN of the transferor’s partnership.

   Name of partnership

   EIN of partnership

   ADAMS STREET PARTNERSHIP FUND

   26–1268403

   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 ☑ No

   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)
REDWOOD INVESTMENT LTD

5a Identifying number, if any
20–4748517

5b Reference ID number (see instructions)

6 Address (including country)
8TH FLOOR, NEWTON TOWER
PORT LOUIS
MP MAURITIUS

7 Country code of country of incorporation or organization (see instructions)
MP

8 Foreign law characterization (see instructions)
LIMITED COMPANY

9 Is the transferee foreign corporation a controlled foreign corporation? ☑ Yes ☐ No

For Paperwork Reduction Act Notice, see separate instructions.
Part III  Information Regarding Transfer of Property (see instructions)

Section A—Cash

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
<th>(c) Description of property</th>
<th>(d) Fair market value on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
   If "Yes," skip the remainder of Part III and go to Part IV.  
   [ ] Yes  [X] No

Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
<th>(c) Description of property</th>
<th>(d) Fair market value on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>08/01/19</td>
<td>STOCKS &amp; SECURITIES</td>
<td>282</td>
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<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals  

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
   [ ] Yes  [X] No

12a 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.  
   [ ] Yes  [X] No

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.  
   [ ] Yes  [X] No

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.  
   [ ] Yes  [X] No

d Enter the transferred loss amount included in gross income as required under section 91 u $  
   [ ] Yes  [X] No

13 Did the transferor transfer property described in section 367(d)(4)?  
   If "No," skip Section C and questions 14a through 15.  
   [ ] Yes  [X] No

Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
<th>(c) Description of property</th>
<th>(d) Useful life</th>
<th>(e) Arm's length price on date of transfer</th>
<th>(f) Cost or other basis</th>
<th>(g) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals  

Form 926 (Rev. 11-2018)
Part IV

Additional Information Regarding Transfer of Property (see instructions)

14a 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?  
   ☐ Yes ☐ No

c 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

Supplemental Part III Information Required To Be Reported (see instructions)

16 Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.
   (a) Before _____%  (b) After _____%  

17 Type of nonrecognition transaction (see instructions)  
   IRC SECTION 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) ☐ Yes ☐ No
   b Gain recognition under section 904(f)(5)(F) ☐ Yes ☐ No
   c Recapture under section 1503(d) ☐ Yes ☐ No
   d Exchange gain under section 987 ☐ Yes ☐ No

19 Did this transfer result from a change in entity classification?  
   ☐ Yes ☐ No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
   If "Yes," complete lines 20b and 20c.
   ☐ Yes ☐ No

b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) $  

c 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 covered by section 367(e)(1)? See instructions  
   ☐ Yes ☐ No
Part I  U.S. Transferor Information (see instructions)

Name of transferor

THE SAINT PAUL FOUNDATION

Identifying number (see instructions)

41–6031510

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? ☐ Yes ☑ 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 ☑ 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 Identifying number

r

s

c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? ☐ Yes ☑ No
      If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation

EIN of parent corporation

r

r

d Have basis adjustments under section 367(a)(4) been made? ☐ Yes ☑ 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.
   a List the name and EIN of the transferor’s partnership.

Name of partnership

EIN of partnership

ADAMS STREET PARTNERSHIP FUND

26–1268403

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 ☐ No
   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)

QMC TELECOM DO BRASIL CESSAO DE

5a Identifying number, if any

5b Reference ID number (see instructions)

b

c Country code of country of incorporation or organization (see instructions)

BR

For Paperwork Reduction Act Notice, see separate instructions.

DA A
**Part III Information Regarding Transfer of Property (see instructions)**

### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
If “Yes,” skip the remainder of Part III and go to Part IV. 

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
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<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
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<tr>
<td>Stock and securities</td>
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<td>STOCKS &amp; SECURITIES</td>
<td>52</td>
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</tbody>
</table>

| Other property |  |
|----------------|-----------------------------|------------------------------------------|------------------------|---------------------------------|
| (not listed under another category) |  |

| Property with built-in loss |  |
|-----------------------------|-----------------------------|------------------------------------------|------------------------|---------------------------------|

Totals | 52 | 52 |

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
Yes ☐ No ☑

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
Yes ☐ No ☑

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?  
Yes ☐ No ☑

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?  
Yes ☐ No ☑

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 u $  
Yes ☐ No ☑

If “No,” skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals |  |  |  |  |  |  |  |

---

Form 926 (Rev. 11-2018)
Additional Information Regarding Transfer of Property

**Part IV**

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

At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? 

- [ ] Yes
- [ ] 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

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) u $ 

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

16. Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.

   a. Before ________% 
   b. After ________% 

17. Type of nonrecognition transaction (see instructions) u IRC SECTION 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) 
   - [ ] Yes
   - [ ] No

   b. Gain recognition under section 904(f)(5)(F) 
   - [ ] Yes
   - [ ] No

   c. Recapture under section 1503(d) 
   - [ ] Yes
   - [ ] No

   d. Exchange gain under section 987 
   - [ ] Yes
   - [ ] No

19. Did this transfer result from a change in entity classification? 

   - [ ] Yes
   - [ ] No

20a. Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions 

   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) u $ 
   
   c. 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 covered by section 367(e)(1)? See instructions 

   - [ ] Yes
   - [ ] No

Form 926 (Rev. 11-2018)
Part I  U.S. Transferor Information (see instructions)

Name of transferor: THE SAINT PAUL FOUNDATION
Identifying number: 41-6031510

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.
   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 [ ] 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      Identifying number

   [ ] Yes [ ] No

   c  If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? [ ] Yes [ ] No
      If not, list the name and employer identification number (EIN) of the parent corporation.

   Name of parent corporation      EIN of parent corporation

   [ ] Yes [ ] No

   d  Have basis adjustments under section 367(a)(4) been made? [ ] Yes [ ] 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.
   a  List the name and EIN of the transferor's partnership.

   Name of partnership      EIN of partnership

   [ ] Yes [ ] No

ADAMS STREET PARTNERSHIP FUND 27-1059255

   b  Did the partner pick up its pro rata share of gain on the transfer of partnership assets? [ ] Yes [X] 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 established securities market? [ ] Yes [X] No

Part II  Transferee Foreign Corporation Information (see instructions)

4  Name of transferee (foreign corporation)

   BCPE BREEZE CAYMAN ATSUMI, LLC

5a  Identifying number, if any

5b  Reference ID number (see instructions)

   [X] BCPEATSUMI

6  Address (including country)

   UGLAND HOUSE, SOUTH CHURCH STREET
   GEORGE TOWN, CAYMAN ISLANDS

7  Country code of country of incorporation or organization (see instructions)

   CJ

8  Foreign law characterization (see instructions)

   CORPORATION

9  Is the transferee foreign corporation a controlled foreign corporation? [ ] Yes [X] No

For Paperwork Reduction Act Notice, see separate instructions.
# Part III Information Regarding Transfer of Property (see instructions)

## Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
☐ Yes ☑ No  
If "Yes," skip the remainder of Part III and go to Part IV.

## Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19 PARTNERSHIP INTEREST</td>
<td>32</td>
<td>32</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>32 32</td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
☐ Yes ☑ No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
☐ Yes ☑ No

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?  
☐ Yes ☑ No

c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?  
☐ Yes ☑ No

d Enter the transferred loss amount included in gross income as required under section 91 u $  
☐ Yes ☑ No

## Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**Part IV  Additional Information Regarding Transfer of Property** (see instructions)

14a  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?  

Yes ☐ No ☐

c  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 ☐

**Supplemental Part III Information Required To Be Reported** (see instructions)

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**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 _____ %  (b) After _____ %

17  Type of nonrecognition transaction (see instructions)  
IRC SECTION 351

18  Indicate whether any transfer reported in Part III is subject to any of the following. 

- Gain recognition under section 904(f)(3)  
  Yes ☐ No ☐

- Gain recognition under section 904(f)(5)(F)  
  Yes ☐ No ☐

- Recapture under section 1503(d)  
  Yes ☐ No ☐

- Exchange gain under section 987  
  Yes ☐ No ☐

19  Did this transfer result from a change in entity classification?  

Yes ☐ No ☐

20a  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions  

Yes ☐ No ☐

b  Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) $

c  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 covered by section 367(e)(1)? See instructions  

Yes ☐ No ☐

---

Form 926 (Rev. 11-2018)
Form 926
(Rev. November 2018)
Department of the Treasury
Internal Revenue Service

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

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

Part I  U.S. Transferor Information
(see instructions)

<table>
<thead>
<tr>
<th>Name of transferor</th>
<th>Identifying number (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>THE SAINT PAUL FOUNDATION</td>
<td>41–6031510</td>
</tr>
</tbody>
</table>

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? ❌ 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? ❌ No
   b. Did the transferor remain in existence after the transfer? ❌ No

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
</table>

If not, list the controlling shareholder(s) and their identifying number(s).

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
</table>

If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? ❌ No

If not, list the name and employer identification number (EIN) of the parent corporation.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
</table>

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.
   a. List the name and EIN of the transferor's partnership.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Name of transferee (foreign corporation)</th>
<th>5a Identifying number, if any</th>
</tr>
</thead>
<tbody>
<tr>
<td>BCPE BREEZE CAYMAN CHITOSE, LLC</td>
<td>27–1059255</td>
</tr>
</tbody>
</table>

6. Address (including country)
   UGLAND HOUSE, SOUTH CHURCH STREET
   GEORGE TOWN, CJ KY1–1104 CAYMAN ISLANDS

<table>
<thead>
<tr>
<th>Address (including country)</th>
<th>5b Reference ID number (see instructions)</th>
</tr>
</thead>
</table>

7. Country code of country of incorporation or organization (see instructions)
   CJ

<table>
<thead>
<tr>
<th>Country code of country of incorporation or organization</th>
<th>5b Reference ID number (see instructions)</th>
</tr>
</thead>
</table>

8. Foreign law characterization (see instructions)
   CORPORATION

<table>
<thead>
<tr>
<th>Foreign law characterization (see instructions)</th>
<th>5b Reference ID number (see instructions)</th>
</tr>
</thead>
</table>

9. Is the transferee foreign corporation a controlled foreign corporation? ❌ No

For Paperwork Reduction Act Notice, see separate instructions.

DAA

Form 926 (Rev. 11-2018)
## Part III Information Regarding Transfer of Property (see instructions)

### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 **Was cash the only property transferred?**

If "Yes," skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>146</td>
<td>146</td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Property with built-in loss |                      |                             |                                          |                        |                               |

**Totals**

11 **Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?**

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

12a **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.

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

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.

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>c</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>d</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

13 **Did the transferor transfer property described in section 367(d)(4)?**

If "No," skip Section C and questions 14a through 15.

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Totals**
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 ________ %  (b) After ________ %

17  Type of nonrecognition transaction (see instructions) u IRC SECTION 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)  x Yes  x No
   b Gain recognition under section 904(f)(5)(F) x Yes  x No
   c Recapture under section 1503(d)  x Yes  x No
   d Exchange gain under section 987  x Yes  x No

19  Did this transfer result from a change in entity classification?  x Yes  x No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
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) u $ 
   c 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)?  x Yes  x No

21  Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation
covered by section 367(e)(1)? See instructions x Yes  x No
Part I  U.S. Transferor Information (see instructions)

Name of transferor

THE SAINT PAUL FOUNDATION

Identifying number (see instructions)

41–6031510

1  Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? ☐ Yes ☒ 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 ☒ 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

Identifying number

Name of parent corporation

EIN of parent corporation

c  If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? ☐ Yes ☒ No

If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation

EIN of parent corporation

d  Have basis adjustments under section 367(a)(4) been made? ☐ Yes ☒ 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.

a  List the name and EIN of the transferor’s partnership.

Name of partnership

EIN of partnership

ADAMS STREET PARTNERSHIP FUND 27–1059255

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 ☒ No
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)

BCPE BREEZE CAYMAN HIRADOMINAMI, LL

5a  Identifying number, if any

5b  Reference ID number (see instructions)

BCPEHIRADOMINAMI

6  Address (including country)

UGLAND HOUSE, SOUTH CHURCH STREET

GEORGE TOWN CJ KY1-1104 CAYMAN ISLANDS

7  Country code of country of incorporation or organization (see instructions)

CJ

8  Foreign law characterization (see instructions)

CORPORATION

9  Is the transferee foreign corporation a controlled foreign corporation? ☐ Yes ☒ No

For Paperwork Reduction Act Notice, see separate instructions.
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
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</tr>
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<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
If “Yes,” skip the remainder of Part III and go to Part IV.  

<table>
<thead>
<tr>
<th>Section B—Other Property (other than intangible property subject to section 367(d))</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) Date of transfer</td>
</tr>
<tr>
<td>----------------------</td>
</tr>
<tr>
<td>Stock and securities</td>
</tr>
<tr>
<td>Inventory</td>
</tr>
<tr>
<td>Other property</td>
</tr>
<tr>
<td>Property with built-in loss</td>
</tr>
<tr>
<td>Totals</td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
If “Yes,” go to line 12b.  

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
If “Yes,” continue to line 12b.  

12b 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,” go to line 12c. If “No,” skip lines 12c and 12d, and go to line 13.  

12c 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.  

12d Enter the transferred loss amount included in gross income as required under section 911 u $  
If “No,” skip Section C and questions 14a through 15.  

13 Did the transferor transfer property described in section 367(d)(4)?  
If “No,” skip Section C and questions 14a through 15.

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm’s length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

---

**Form 926 (Rev. 11-2018)**
Part IV Additional Information Regarding Transfer of Property (see instructions)

14a 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?  

   Yes ☐  No ☐

c 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 ☐

Supplemental Part III Information Required To Be Reported (see instructions)

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 % (b) After %

17 Type of nonrecognition transaction (see instructions)  

   IRC SECTION 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)  
       Yes ☐  No ☐
   b Gain recognition under section 904(f)(5)(F)  
       Yes ☐  No ☐
   c Recapture under section 1503(d)  
       Yes ☐  No ☐
   d Exchange gain under section 987  
       Yes ☐  No ☐

19 Did this transfer result from a change in entity classification?  

   Yes ☐  No ☐

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
   If “Yes,” complete lines 20b and 20c.

   Yes ☐  No ☐

b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) $  

c 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 covered by section 367(e)(1)? See instructions  

   Yes ☐  No ☐
**Form 926**

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

<table>
<thead>
<tr>
<th>Part I</th>
<th>U.S. Transferor Information (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Name of transferor</strong></td>
<td><strong>THE SAINT PAUL FOUNDATION</strong></td>
</tr>
<tr>
<td><strong>1</strong></td>
<td>Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?</td>
</tr>
<tr>
<td><strong>2</strong></td>
<td>If the transferor was a corporation, complete questions 2a through 2d.</td>
</tr>
<tr>
<td><strong>a</strong></td>
<td>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?</td>
</tr>
<tr>
<td><strong>b</strong></td>
<td>Did the transferor remain in existence after the transfer?</td>
</tr>
<tr>
<td>If not, list the controlling shareholder(s) and their identifying number(s).</td>
<td></td>
</tr>
</tbody>
</table>

**Controlling shareholder**

<table>
<thead>
<tr>
<th><strong>Identifying number</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td></td>
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<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Name of parent corporation</strong></th>
<th><strong>EIN of parent corporation</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<tr>
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<td></td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| **c** | If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? | | Yes | No |
| If not, list the name and employer identification number (EIN) of the parent corporation. | | | |

<table>
<thead>
<tr>
<th><strong>Name of parent corporation</strong></th>
<th><strong>EIN of parent corporation</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| **d** | Have basis adjustments under section 367(a)(4) been made? | | Yes | No |

**Part II  | Transferee Foreign Corporation Information (see instructions)**

| **4** | Name of transferee (foreign corporation) | **BCPE BREEZE CAYMAN HIRONO, LLC** |
| **5a** | Identifying number, if any | | |
| **5b** | Reference ID number (see instructions) | **BCPEHIRONO** |
| **6** | Address (including country) | **UGLAND HOUSE, SOUTH CHURCH STREET GEORGE TOWN CJ KY1-1104 CAYMAN ISLANDS** |
| **7** | Country code of country of incorporation or organization (see instructions) | **CJ** |
| **8** | Foreign law characterization (see instructions) | **CORPORATION** |
| **9** | Is the transferee foreign corporation a controlled foreign corporation? | | Yes | No |

For Paperwork Reduction Act Notice, see separate instructions.

DAA
Part III  Information Regarding Transfer of Property  (see instructions)

**Section A—Cash**

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  [ ] Yes  [x] No

If “Yes,” skip the remainder of Part III and go to Part IV.

**Section B—Other Property (other than intangible property subject to section 367(d))**

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Other property

<table>
<thead>
<tr>
<th>Date</th>
<th>Description of property</th>
<th>Fair market value on date of transfer</th>
<th>Cost or other basis</th>
<th>Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>159</td>
<td>159</td>
<td></td>
</tr>
</tbody>
</table>

Totals 159 159

**Section C—Intangible Property Subject to Section 367(d)**

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  [ ] Yes  [x] No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  [ ] Yes  [x] No

If “Yes,” go to line 12b.

12b 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?  [ ] Yes  [x] No

If “Yes,” continue to line 12c. If “No,” skip lines 12c and 12d, and go to line 13.

12c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?  [ ] Yes  [x] No

If “Yes,” continue to line 12d. If “No,” skip line 12d, and go to line 13.

12d Enter the transferred loss amount included in gross income as required under section 911  $ __________________________

13 Did the transferor transfer property described in section 367(d)(4)?  [ ] Yes  [x] No

If “No,” skip Section C and questions 14a through 15.
14a 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

14b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  
   Yes  No

14c 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

14d 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

Supplemental Part III Information Required To Be Reported (see instructions)

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 %  
   (b) After %  

17 Type of nonrecognition transaction (see instructions)  
   IRC SECTION 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)  
   Yes  No
   b Gain recognition under section 904(f)(5)(F)  
   Yes  No
   c Recapture under section 1503(d)  
   Yes  No
   d Exchange gain under section 987  
   Yes  No

19 Did this transfer result from a change in entity classification?  
   Yes  No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions  
   Yes  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) $  
   c 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 covered by section 367(e)(1)? See instructions  
   Yes  No
Return by a U.S. Transferor of Property to a Foreign Corporation

Part I U.S. Transferor Information

Name of transferor

THE SAINT PAUL FOUNDATION

41-6031510

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? ☐ Yes ☒ 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 ☒ 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).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? ☐ Yes ☒ No

If not, list the name and employer identification number (EIN) of the parent corporation.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

d Have basis adjustments under section 367(a)(4) been made? ☐ Yes ☒ 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.

a List the name and EIN of the transferor’s partnership.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADAMS STREET PARTNERSHIP FUND</td>
<td>27-1059255</td>
</tr>
</tbody>
</table>

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 ☒ No

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

4 Name of transferee (foreign corporation)

BCPE BREEZE CAYMAN NOHEJI, LLC

5a Identifying number, if any

5b Reference ID number (see instructions)

6 Address (including country)

UGLAND HOUSE, SOUTH CHURCH STREET

GEORGE TOWN, KY1-1104 CAYMAN ISLANDS

7 Country code of country of incorporation or organization (see instructions)

CJ

8 Foreign law characterization (see instructions)

CORPORATION

9 Is the transferee foreign corporation a controlled foreign corporation? ☐ Yes ☒ No

For Paperwork Reduction Act Notice, see separate instructions.

DAA
### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**10 Was cash the only property transferred?**

If "Yes," skip the remainder of Part III and go to Part IV.

- Yes [ ]
- No [x] Yes

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>354</td>
<td>354</td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Property with built-in loss | | | | | |

**Totals** 354 354

**11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?**

- Yes [ ]
- No [x] Yes

**12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?**

- Yes [ ]
- No [x] Yes

**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?**

- Yes [ ]
- No [x] Yes

**c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?**

- Yes [ ]
- No [x] Yes

**d Enter the transferred loss amount included in gross income as required under section 91 u $**

- Yes [ ]
- No [x] Yes

**13 Did the transferor transfer property described in section 367(d)(4)?**

- Yes [ ]
- No [x] Yes

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Totals**
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 ________ %  (b) After ________ %

17  Type of nonrecognition transaction (see instructions)  
    IRC SECTION 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)  
      Yes  X  No
   b  Gain recognition under section 904(f)(5)(F)  
      Yes  X  No
   c  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

20a  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
     If "Yes," complete lines 20b and 20c.
     Yes  X  No

   b  Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) $ ____________
   c  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
    covered by section 367(e)(1)? See instructions  
    Yes  X  No
Return by a U.S. Transferor of Property to a Foreign Corporation

Part I  U.S. Transferor Information (see instructions)

THE SAINT PAUL FOUNDATION

Identifying number 41-6031510

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? ☑ Yes ☒ 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 ☒ 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

      Identifying number

      ____________________________  ____________________________

   c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? ☐ Yes ☐ No
      If not, list the name and employer identification number (EIN) of the parent corporation.

      Name of parent corporation

      EIN of parent corporation

      ____________________________  ____________________________

   d Have basis adjustments under section 367(a)(4) been made? ☑ Yes ☒ 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.
   a List the name and EIN of the transferor’s partnership.

      Name of partnership

      EIN of partnership

      ____________________________  ____________________________

   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 ☒ No
   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)

   BCPE BREEZE CAYMAN SANMORI, LLC

5a Identifying number, if any

5b Reference ID number (see instructions)

   BCPESANMORI

6 Address (including country)

   UGLAND HOUSE, SOUTH CHURCH STREET
   GEORGE TOWN  KY1-1104  CAYMAN ISLANDS

7 Country code of country of incorporation or organization (see instructions)

   CJ

8 Foreign law characterization (see instructions)

   CORPORATION

9 Is the transferee foreign corporation a controlled foreign corporation? ☑ Yes ☒ No
### Section A—Cash

<table>
<thead>
<tr>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? □ Yes  ☑ No

If “Yes,” skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19 PARTNERSHIP INTEREST</td>
<td>130</td>
<td>130</td>
<td></td>
</tr>
<tr>
<td>Other property</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? □ Yes  ☑ No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? □ Yes  ☑ No

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? □ Yes  ☑ No

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? □ Yes  ☑ No

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 u $ ☑ No

13 Did the transferor transfer property described in section 367(d)(4)? □ Yes  ☑ No

If “No,” skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm’s length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
### 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  _______%  (b) After  _______%

17  Type of nonrecognition transaction (see instructions)  U  IRC SECTION 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 1503(d)  
   d  Exchange gain under section 987  

19  Did this transfer result from a change in entity classification?  

20a  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
   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)  U  $  
   c  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)?  

21  Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions

---

DAA
**Part I  U.S. Transferor Information** (see instructions)

**THE SAINT PAUL FOUNDATION**

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?</td>
<td></td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>2 If the transferor was a corporation, complete questions 2a through 2d.</td>
<td></td>
<td></td>
<td></td>
</tr>
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<td>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?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>b Did the transferor remain in existence after the transfer?</td>
<td></td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>If not, list the controlling shareholder(s) and their identifying number(s).</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?</th>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>If not, list the name and employer identification number (EIN) of the parent corporation.</td>
<td></td>
<td></td>
<td></td>
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<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
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</table>

<table>
<thead>
<tr>
<th>d Have basis adjustments under section 367(a)(4) been made?</th>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a List the name and EIN of the transferor's partnership.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
</table>

**Part II  Transferee Foreign Corporation Information** (see instructions)

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>4 Name of transferee (foreign corporation)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>BCPE BREEZE CAYMAN TANOHATA, LLC</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5a Identifying number, if any</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5b Reference ID number</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Address (including country)</th>
<th></th>
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<th></th>
</tr>
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<tbody>
<tr>
<td>UGLAND HOUSE, SOUTH CHURCH STREET</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>GEORGE TOWN</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CJ KY1-1104 CAYMAN ISLANDANS</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7 Country code of country of incorporation or organization (see instructions)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CJ</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| 8 Foreign law characterization (see instructions)                        |        |     |    |
| BCPE TANOHATA                                                           |        |     |    |

<table>
<thead>
<tr>
<th>9 Is the transferee foreign corporation a controlled foreign corporation?</th>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

**For Paperwork Reduction Act Notice, see separate instructions.**
**Part III Information Regarding Transfer of Property** *(see instructions)*

### Section A—Cash

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
<th>(c) Description of property</th>
<th>(d) Fair market value on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 **Was cash the only property transferred?**

- [ ] Yes  [x] No

If "Yes," skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
<th>(c) Description of property</th>
<th>(d) Fair market value on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>44</td>
<td>44</td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- Property with built-in loss

**Totals**: 44 44

11 **Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?**

- [ ] Yes  [x] No

12a **Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?**

- [ ] Yes  [x] No

If "Yes," go to line 12b.

12b **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?**

- [ ] Yes  [x] No

If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.

12c **Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?**

- [ ] Yes  [x] No

If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.

12d **Enter the transferred loss amount included in gross income as required under section 91 u $**

13 **Did the transferor transfer property described in section 367(d)(4)?**

- [ ] Yes  [x] No

If "No," skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
<th>(c) Description of property</th>
<th>(d) Useful life</th>
<th>(e) Arm's length price on date of transfer</th>
<th>(f) Cost or other basis</th>
<th>(g) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
</table>

- Property described in sec. 367(d)(4)

**Totals**

---

Form 926 (Rev. 11-2018)
Part IV  Additional Information Regarding Transfer of Property (see instructions)

14a  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

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

Supplemental Part III Information Required To Be Reported (see instructions)

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 ___________%  (b) After ___________%

17  Type of nonrecognition transaction (see instructions)  u IRC SECTION 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)  Yes  No

b  Gain recognition under section 904(f)(5)(F)  Yes  No

c  Recapture under section 1503(d)  Yes  No

d  Exchange gain under section 987  Yes  No

19  Did this transfer result from a change in entity classification?  Yes  No

20a  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions.  Yes  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)  $ __________________

21  Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions.  Yes  No
Form 926
(Rev. November 2018)
Department of the Treasury
Internal Revenue Service

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

u Go to www.irs.gov/Form926 for instructions and the latest information.
u 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
THE SAINT PAUL FOUNDATION

Identifying number (see instructions)
41-6031510

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? ☐ Yes ☑ 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 ☐ 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

Identifying number


c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? ☐ Yes ☐ No

      If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation

EIN of parent corporation


d Have basis adjustments under section 367(a)(4) been made? ☐ Yes ☑ 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.

   a List the name and EIN of the transferor’s partnership.

Name of partnership
ADAMS STREET PARTNERSHIP FUND

EIN of partnership
27-1059255

   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 ☐ No
   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)
BCPE BREEZE CAYMAN TSUKIKOSHIGENYA

5a Identifying number, if any

5b Reference ID number (see instructions)
BCPE TSUKIKOSHIGENYA

6 Address (including country)
UGLAND HOUSE, SOUTH CHURCH STREET
GEORGE TOWN CJ KY1-1104 CAYMAN ISLANDS

7 Country code of country of incorporation or organization (see instructions)
CJ

8 Foreign law characterization (see instructions)
CORPORATION

9 Is the transferee foreign corporation a controlled foreign corporation? ☑ Yes ☐ No

For Paperwork Reduction Act Notice, see separate instructions.

Form 926 (Rev. 11-2018)
DAA
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**10** Was cash the only property transferred?  
If “Yes,” skip the remainder of Part III and go to Part IV.  

**X** Yes

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
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<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>201</td>
<td>201</td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
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<td></td>
<td></td>
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<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

**Totals**

101 101

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Totals**

**DAA**
14a 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?  

[ ] Yes [ ] No

c 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

Supplemental Part III Information Required To Be Reported (see instructions)

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 ________% (b) After ________%  

17 Type of nonrecognition transaction (see instructions) IRC SECTION 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 1503(d)  
- [d] Exchange gain under section 987

[ ] Yes [ ] No

19 Did this transfer result from a change in entity classification?  

[ ] Yes [ ] No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions  

[ ] Yes [ ] 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) $ .

[ ] Yes [ ] No

c 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 covered by section 367(e)(1)? See instructions  

[ ] Yes [ ] No
### Part I  U.S. Transferor Information (see instructions)

#### Name of transferor

**THE SAINT PAUL FOUNDATION**

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
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<td></td>
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<td>If not, list the controlling shareholder(s) and their identifying number(s).</td>
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</tr>
<tr>
<td>Controlling shareholder</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Identifying number</td>
<td></td>
<td></td>
</tr>
<tr>
<td>c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>If not, list the name and employer identification number (EIN) of the parent corporation.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Name of parent corporation**

**EIN of parent corporation**

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>d Have basis adjustments under section 367(a)(4) been made?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Part II Transferee Foreign Corporation Information (see instructions)

#### Name of transferee (foreign corporation)

**BCPE BREEZE CAYMAN UKUJIMA, LLC**

<table>
<thead>
<tr>
<th>Address (including country)</th>
</tr>
</thead>
<tbody>
<tr>
<td>UGLAND HOUSE, SOUTH CHURCH STREET</td>
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<td>GEORGE TOWN</td>
</tr>
<tr>
<td>CJ KY1-1104 CAYMAN ISLANDS</td>
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</tbody>
</table>

<table>
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<tr>
<th>Country code of country of incorporation or organization (see instructions)</th>
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</thead>
<tbody>
<tr>
<td>CJ</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Foreign law characterization (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>CORPORATION</td>
</tr>
</tbody>
</table>

#### Is the transferee foreign corporation a controlled foreign corporation? | Yes | No |

### For Paperwork Reduction Act Notice, see separate instructions.
**Part III Information Regarding Transfer of Property** (see instructions)

### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
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</thead>
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<tr>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 **Was cash the only property transferred?**

- Yes [x]  No [ ]

If "Yes," skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
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<th>(a) Date of transfer</th>
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<tr>
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<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>346</td>
<td>346</td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
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<td></td>
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</tr>
</tbody>
</table>

| Property with built-in loss |                      |                             |                                          |                        |                                |

Totals

11 **Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?**

- Yes [ ]  No [x]

12a **Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?**

- Yes [x]  No [ ]

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?**

- Yes [ ]  No [x]

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?**

- Yes [ ]  No [x]

If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.

d **Did the transferor transfer property described in section 367(d)(4)?**

- Yes [ ]  No [x]

If "No," skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals
14a 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?  
Yes ☐ No ☐

c 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 ☐

Supplemental Part III Information Required To Be Reported (see instructions)

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 _________%  (b) After _________%  IRC SECTION 351

17 Type of nonrecognition transaction (see instructions)  
Gain recognition under section 904(f)(3) ☐ Yes ☐ No ☐

Gain recognition under section 904(f)(5)(F) ☐ Yes ☐ No ☐

Recapture under section 1503(d) ☐ Yes ☐ No ☐

Exchange gain under section 987 ☐ Yes ☐ No ☐

18 Indicate whether any transfer reported in Part III is subject to any of the following.

a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions  
Yes ☐ 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) $ _______

C 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 covered by section 367(e)(1)? See instructions  
Yes ☐ No ☐

Form 926 (Rev. 11-2018)
Form 926

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

Part I U.S. Transferor Information

Name of transferor

THE SAINT PAUL FOUNDATION

41-6031510

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? ☐ Yes ☒ No

2 If the transferee 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 ☒ 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).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? ☐ Yes ☒ No

If not, list the name and employer identification number (EIN) of the parent corporation.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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.

a List the name and EIN of the transferor's partnership.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<tr>
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<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

ADAMS STREET PARTNERSHIP FUND

27-1059255

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 ☒ No

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

4 Name of transferee (foreign corporation)

BCPE BREEZE CAYMAN YOKOHAMA, LLC

6 Address (including country)

UGLAND HOUSE, SOUTH CHURCH STREET

GEORGE TOWN KY1-1104 CAYMAN ISLANDS

7 Country code of country of incorporation or organization (see instructions)

CJ

8 Foreign law characterization (see instructions)

CORPORATION

5a Identifying number, if any

5b Reference ID number (see instructions)

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>BCPEYOKOHAMA</td>
</tr>
</tbody>
</table>

For Paperwork Reduction Act Notice, see separate instructions.
## Part III Information Regarding Transfer of Property (see instructions)

### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  

If "Yes," skip the remainder of Part III and go to Part IV.  

**No** ☐ Yes ☒

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>814</td>
<td>814</td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Totals**  

<table>
<thead>
<tr>
<th>Property with built-in loss</th>
<th>Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**814**  

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  

**No** ☐ Yes ☒

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  

**No** ☐ Yes ☒

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?  

**No** ☐ Yes ☒

c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?  

**No** ☐ Yes ☒

d Enter the transferred loss amount included in gross income as required under section 911 $  

**No** ☐ Yes ☒

13 Did the transferor transfer property described in section 367(d)(4)?  

**No** ☐ Yes ☒

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Totals**  

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**THE SAINT PAUL FOUNDATION**  
41-6031510

**Form 926 (Rev. 11-2018)**
14a 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? Yes No

c 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

Supplemental Part III Information Required To Be Reported (see instructions)

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 % (b) After %

17 Type of nonrecognition transaction (see instructions) IRC SECTION 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) Yes No
   b Gain recognition under section 904(f)(5)(F) Yes No
   c Recapture under section 1503(d) Yes No
   d Exchange gain under section 987 Yes No

19 Did this transfer result from a change in entity classification? Yes No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions.
   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) $.
   c 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 covered by section 367(e)(1)? See instructions.

Yes No

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

**Part I  U.S. Transferor Information**

<table>
<thead>
<tr>
<th>Name of transferor</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td>THE SAINT PAUL FOUNDATION</td>
<td>41-6031510</td>
</tr>
</tbody>
</table>

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  
   - Yes [ ]  
   - No [X]  

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 [ ]  
     - No [X]  
   - **b** Did the transferor remain in existence after the transfer?  
     - Yes [X]  
     - No [ ]  

   *If not, list the controlling shareholder(s) and their identifying number(s).*

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

   |                         |                    |

   |                         |                    |

   |                         |                    |

   |                         |                    |

3. **c** If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?  
   - Yes [ ]  
   - No [X]  

   *If not, list the name and employer identification number (EIN) of the parent corporation.*

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

   |                             |                           |

   |                             |                           |

4. **d** Have basis adjustments under section 367(a)(4) been made?  
   - Yes [ ]  
   - No [X]  

5. 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.
   - **a** List the name and EIN of the transferor’s partnership.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADAMS STREET PARTNERSHIP FUND</td>
<td>27-1058929</td>
</tr>
</tbody>
</table>

   | b** | Did the partner pick up its pro rata share of gain on the transfer of partnership assets?  
     - Yes [ ]  
     - No [X]  

   | 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 established securities market?  
     - Yes [X]  
     - No [ ]  

**Part II  Transferee Foreign Corporation Information**

6. **Address** (including country)
   - **8TH FLOOR, NEWTON TOWER**  
   - **PORT LOUIS**  
   - **MP**  
   - **MAURITIUS**  

7. Country code of country of incorporation or organization (see instructions)
   - **MP**

8. **Foreign law characterization** (see instructions)
   - **CORPORATION**

9. Is the transferee foreign corporation a controlled foreign corporation?  
   - Yes [X]  
   - No [ ]  

---

For Paperwork Reduction Act Notice, see separate instructions.
### Part III  Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
<th>(c) Description of property</th>
<th>(d) Fair market value on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
If “Yes,” skip the remainder of Part III and go to Part IV.

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
<th>(c) Description of property</th>
<th>(d) Fair market value on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>07/12/19</td>
<td>STOCKS &amp; SECURITIES</td>
<td>808</td>
<td>808</td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(not listed under another category)</td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>808</td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
If “Yes,” go to line 12b.

12a 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 911 u § *(blank)*  
If “No,” skip Section C and questions 14a through 15.

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
<th>(c) Description of property</th>
<th>(d) Useful life</th>
<th>(e) Arm’s length price on date of transfer</th>
<th>(f) Cost or other basis</th>
<th>(g) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
14a 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?

☐ Yes ☐ No

c 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) u $ ____________________________

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

Supplemental Part III Information Required To Be Reported (see instructions)

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 _________ %  (b) After _________ %

17 Type of nonrecognition transaction (see instructions) u IRC SECTION 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) ☐ Yes ☐ No

b Gain recognition under section 904(f)(5)(F) ☐ Yes ☐ No

c Recapture under section 1503(d) ☐ Yes ☐ No

d Exchange gain under section 987 ☐ Yes ☐ No

19 Did this transfer result from a change in entity classification?

☐ Yes ☐ No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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) u $ ____________________________

c 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 covered by section 367(e)(1)? See instructions

☐ Yes ☐ No
Form 926
Return by a U.S. Transferor of Property to a Foreign Corporation

Part I  U.S. Transferor Information  (see instructions)

Name of transferor  THE SAINT PAUL FOUNDATION
Identifying number  41-6031510

1  Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  ...  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?  ...  No
   b  Did the transferor remain in existence after the transfer?  ...  No

   If not, list the controlling shareholder(s) and their identifying number(s).

   Controlling shareholder  Identifying number

   Name of parent corporation  EIN of parent corporation

   c  If the transferor was a member of an affiliated group filing a consolidated return, was it the parent
      corporation?  ...  No

   If not, list the name and employer identification number (EIN) of the parent corporation.

   Name of parent corporation  EIN of parent corporation

   d  Have basis adjustments under section 367(a)(4) been made?  ...  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.
   a  List the name and EIN of the transferor's partnership.

   Name of partnership  EIN of partnership

   ADAMS STREET PARTNERSHIP FUND  27-1058929

   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?  ...  No

   d  Is the partner disposing of an interest in a limited partnership that is regularly traded on an established
      securities market?  ...  No

Part II  Transferee Foreign Corporation Information  (see instructions)

4  Name of transferee (foreign corporation)  NAPSBURY LIMITED

6  Address (including country)  COURTLANDS, PARKLANDS AVENUE,
                              WEST SUSSEX  UK  BN12 4NG  GREAT BRITAIN (UK)

7  Country code of country of incorporation or organization (see instructions)  UK

8  Foreign law characterization (see instructions)  CORPORATION

9  Is the transferee foreign corporation a controlled foreign corporation?  ...  No
### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td>03/31/19</td>
<td></td>
<td></td>
<td></td>
<td>153</td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? □ Yes □ No

If "Yes," skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>03/31/19 STOCK</td>
<td>214</td>
<td>214</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td>214</td>
<td>214</td>
<td></td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? □ Yes □ No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? □ Yes □ No

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? □ Yes □ No

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? □ Yes □ No

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 u $ __________

13 Did the transferor transfer property described in section 367(d)(4)? □ Yes □ No

If "No," skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
**Part IV**

**Additional Information Regarding Transfer of Property** (see instructions)

14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

c 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?

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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) u $ ____________.

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)?

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

**Supplemental Part III Information Required To Be Reported** (see instructions)

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**Form 926 (Rev. 11-2018)**

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**Page 3**

---

**THE SAINT PAUL FOUNDATION**

---

**DAA**
Part I  U.S. Transferor Information (see instructions)

Name of transferor

THE SAINT PAUL FOUNDATION

41–6031510

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? □ Yes □ 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 □ 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 Identifying number

Name of parent corporation EIN of parent corporation

c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? □ Yes □ No

If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation EIN of parent corporation

d Have basis adjustments under section 367(a)(4) been made? □ Yes □ 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.

a List the name and EIN of the transferor’s partnership.

Name of partnership EIN of partnership

ADAMS STREET PARTNERSHIP FUND 27–1058929

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 □ No

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)

QMC TELECOM DO BRASIL CESSAO DE

5a Identifying number, if any

5b Reference ID number (see instructions)

6 Address (including country)

RAU GOMES DE CARVALHO

SAO PAULO BR 04547–005 BRAZIL

7 Country code of country of incorporation or organization (see instructions)

BR

8 Foreign law characterization (see instructions)

CORPORATION

9 Is the transferee foreign corporation a controlled foreign corporation? □ Yes □ No

For Paperwork Reduction Act Notice, see separate instructions.
Part III Information Regarding Transfer of Property (see instructions)

Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? [ ] Yes [ ] No

If “Yes,” skip the remainder of Part III and go to Part IV.

Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>10/23/19</td>
<td>STOCKS &amp; SECURITIES</td>
<td>61</td>
<td>61</td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td>61</td>
<td>61</td>
<td></td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? [ ] Yes [ ] No

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? [ ] Yes [ ] No

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? [ ] Yes [ ] No

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 911. [ ] Yes [ ] No

13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

If “No,” skip Section C and questions 14a through 15.

Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm’s length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
14a. 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?  
   ☐ Yes  ☐ No

c. 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) u $ ________________.

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

Supplemental Part III Information Required To Be Reported (see instructions)

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 ________%  (b) After ________%  

17. Type of nonrecognition transaction (see instructions) u IRC SECTION 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) ☐ Yes  ☒ No
   b. Gain recognition under section 904(f)(5)(F) ☐ Yes  ☒ No
   c. Recapture under section 1503(d) ☐ Yes  ☒ No
   d. Exchange gain under section 987 ☐ Yes  ☒ No

19. Did this transfer result from a change in entity classification?  
   ☐ Yes  ☒ No

20a. Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

   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) u $ ____________________
   c. 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 covered by section 367(e)(1)? See instructions  
      ☐ Yes  ☒ No
### Part I U.S. Transferor Information (see instructions)

<table>
<thead>
<tr>
<th>Name of transferor</th>
<th>Identifying number (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>THE SAINT PAUL FOUNDATION</td>
<td>41–6031510</td>
</tr>
</tbody>
</table>

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  
   - Yes □  
   - No [X] **

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 □  
     - No [X] **
   - b Did the transferor remain in existence after the transfer?  
     - Yes □  
     - No [X] **

   If not, list the controlling shareholder(s) and their identifying number(s).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

   c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?  
   - Yes □  
   - No [X] **

   If not, list the name and employer identification number (EIN) of the parent corporation.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

   d Have basis adjustments under section 367(a)(4) been made?  
   - Yes □  
   - No [X] **

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.
   - a List the name and EIN of the transferor's partnership.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

   b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?  
   - Yes □  
   - No [X] **

   c Is the partner disposing of its entire interest in the partnership?  
   - Yes □  
   - No [X] **

   d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market?  
   - Yes □  
   - No [X] **

### Part II Transferee Foreign Corporation Information (see instructions)

<table>
<thead>
<tr>
<th>Name of transferee (foreign corporation)</th>
<th>Identifying number, if any</th>
</tr>
</thead>
<tbody>
<tr>
<td>REDWOOD INVESTMENT LTD</td>
<td>20–4748517</td>
</tr>
</tbody>
</table>

5. a Identifying number, if any |

6. Address (including country)  
   - 8TH FLOOR, NEWTON TOWER  
   - PORT LOUIS MP MAURITIUS

7. Country code of country of incorporation or organization (see instructions)  
   - MP

8. Foreign law characterization (see instructions)  
   - LIMITED COMPANY

9. Is the transferee foreign corporation a controlled foreign corporation?  
   - Yes □  
   - No [X] **

For Paperwork Reduction Act Notice, see separate instructions.
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  

If "Yes," skip the remainder of Part III and go to Part IV.  

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a specified 10%-owned 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 911 u $  

13 Did the transferor transfer property described in section 367(d)(4)?  

If "No," skip Section C and questions 14a through 15.  

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td>STOCKS &amp; SECURITIES</td>
<td>1,119</td>
<td>1,119</td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td>1,119</td>
<td>1,119</td>
<td></td>
</tr>
</tbody>
</table>

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years? 

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

c 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?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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) u $ 

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)?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Supplemental Part III Information Required To Be Reported (see instructions)

---

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 ______ %  (b) After ______ %

17 Type of nonrecognition transaction (see instructions) u IRC SECTION 351

18 Indicate whether any transfer reported in Part III is subject to any of the following.

<table>
<thead>
<tr>
<th>a</th>
<th>b</th>
<th>c</th>
<th>d</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>X</td>
<td>No</td>
<td></td>
</tr>
</tbody>
</table>

Gain recognition under section 904(f)(3)

Gain recognition under section 904(f)(5)(F)

Recapture under section 1503(d)

Exchange gain under section 987

19 Did this transfer result from a change in entity classification?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

If “Yes,” complete lines 20b and 20c.

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) u $ 

c 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)?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Form 926
(Rev. November 2018)
Department of the Treasury
Internal Revenue Service

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.

Part I U.S. Transferor Information (see instructions)

Name of transferor

THE SAINT PAUL FOUNDATION
41-6031510

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? Yes \(\checkmark\) 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 \(\checkmark\) No
   b Did the transferor remain in existence after the transfer? Yes \(\checkmark\) 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 \(\checkmark\) No

   If not, list the name and employer identification number (EIN) of the parent corporation.

   Name of parent corporation

   EIN of parent corporation

   
   
   
   d Have basis adjustments under section 367(a)(4) been made? Yes \(\checkmark\) 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.
   a List the name and EIN of the transferor’s partnership.

   Name of partnership

   EIN of partnership

   AETHER REAL ASSETS I, L.P.
   26-4196882

   b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Yes \(\checkmark\) No
   c Is the partner disposing of its entire interest in the partnership? Yes \(\checkmark\) No
   d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Yes \(\checkmark\) No

Part II Transferee Foreign Corporation Information (see instructions)

4 Name of transferee (foreign corporation)

CBC KETO PUMPS SARL

6 Address (including country)

8-10 AVENUE DE LA GARE

LUXEMBOURG

LU L-1610 LUXEMBOURG

5a Identifying number, if any

5b Reference ID number (see instructions)

CBCKETO

7 Country code of country of incorporation or organization (see instructions)

LU

8 Foreign law characterization (see instructions)

CORPORATION

9 Is the transferee foreign corporation a controlled foreign corporation? Yes \(\checkmark\) No

For Paperwork Reduction Act Notice, see separate instructions.
**Section A—Cash**

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? ☐ Yes ☒ No

If "Yes," skip the remainder of Part III and go to Part IV.

---

**Section B—Other Property (other than intangible property subject to section 367(d))**

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td>FOREIGN CURRENCY — GBP 33</td>
<td>33</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals 33 33

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? ☐ Yes ☒ No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? ☐ Yes ☒ No

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? ☐ Yes ☒ No

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? ☐ Yes ☒ No

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 u. $ ☐ Yes ☒ No

If "No," skip Section C and questions 14a through 15.

---

**Section C—Intangible Property Subject to Section 367(d)**

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

---
Additional Information Regarding Transfer of Property (see instructions)

Part IV

14a 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?  ☐ Yes  ☐ No

c 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

Supplemental Part III Information Required To Be Reported (see instructions)

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 __________ %  (b) After __________ %

17 Type of nonrecognition transaction (see instructions) ☐ IRC SECTION 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)  ☐ Yes  ☐ No

b Gain recognition under section 904(f)(5)(F)  ☐ Yes  ☐ No

c Recapture under section 1503(d)  ☐ Yes  ☐ No

d Exchange gain under section 987  ☐ Yes  ☐ No

19 Did this transfer result from a change in entity classification?  ☐ Yes  ☐ No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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) $ ________________

c 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 covered by section 367(e)(1)? See instructions  ☐ Yes  ☐ No
Form 926
(Return by a U.S. Transferor of Property to a Foreign Corporation)

Part I  U.S. Transferor Information

Name of transferor: THE SAINT PAUL FOUNDATION

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>1  Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>2a  If the transferor was a corporation, complete questions 2a through 2d.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2b  Did the transferor remain in existence after the transfer?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>If not, list the controlling shareholder(s) and their identifying number(s).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3c  If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>If not, list the name and employer identification number (EIN) of the parent corporation.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3d  Have basis adjustments under section 367(a)(4) been made?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Part II  Transferee Foreign Corporation Information

Name of transferee: MOVENTAS HOLDINGS LUXEMBOURG SARL

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>4a  Is the transferee foreign corporation a controlled foreign corporation?</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>6  Address (including country)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7  Country code of country of incorporation or organization (see instructions)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8  Foreign law characterization (see instructions)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

For Paperwork Reduction Act Notice, see separate instructions.
### Part III Information Regarding Transfer of Property

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? [ ] Yes [ ] No

If "Yes," skip the remainder of Part III and go to Part IV.

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td>FOREIGN CURRENCY–GBP</td>
<td>6,107</td>
<td>6,107</td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? [ ] Yes [ ] No

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? [ ] Yes [ ] No

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? [ ] Yes [ ] No

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 u $ ____________________________ [ ] Yes [ ] No

13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

If "No," skip Section C and questions 14a through 15.

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

---

Form 926 (Rev. 11-2018)
14a 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? Yes ☐ No ☐

c 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 ☐

Supplemental Part III Information Required To Be Reported (see instructions)

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 ☞ %

(b) After ☞ %

17 Type of nonrecognition transaction (see instructions) ☞ IRC SECTION 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) Yes ☐ No ☒

b Gain recognition under section 904(f)(5)(F) Yes ☐ No ☒

c Recapture under section 1503(d) Yes ☐ No ☒

d Exchange gain under section 987 Yes ☐ No ☒

19 Did this transfer result from a change in entity classification? Yes ☐ No ☒

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions Yes ☐ 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) ☞ $

c 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 covered by section 367(e)(1)? See instructions Yes ☐ No ☒
Part I  U.S. Transferor Information (see instructions)

Name of transferor

THE SAINT PAUL FOUNDATION

Identifying number

41-6031510

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.

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 [ ] 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

Identifying number


c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? [ ] Yes [ ] No

If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation

EIN of parent corporation


d Have basis adjustments under section 367(a)(4) been made? [ ] Yes [ ] 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.

a List the name and EIN of the transferor’s partnership.

Name of partnership

EIN of partnership


AETHER REAL ASSETS II, L.P.

b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? [ ] Yes [X] 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 established securities market? [ ] Yes [X] No

Part II  Transferee Foreign Corporation Information (see instructions)

4 Name of transferee (foreign corporation)

AJ LUCAS GROUP LIMITED

5a Identifying number, if any

5b Reference ID number (see instructions)

AJLUCAS1

6 Address (including country)

1 ELIZABETH PLAZA

NORTH SYDNEY, AS NSW 2060 AUSTRALIA

7 Country code of country of incorporation or organization (see instructions)

AS

8 Foreign law characterization (see instructions)

CORPORATION

9 Is the transferee foreign corporation a controlled foreign corporation? [ ] Yes [X] No
Form 926 (Rev. 11-2018)  THE SAINT PAUL FOUNDATION  41-6031510  Page 2

Part III   Information Regarding Transfer of Property (see instructions)

Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? ☐ Yes ☒ No

If “Yes,” skip the remainder of Part III and go to Part IV.

Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
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</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>11/18/19 DEBT PRINCIPAL &amp; INTEREST</td>
<td>6,121</td>
<td>6,121</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Property with built-in loss

Totals 6,121 6,121

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? ☐ Yes ☒ No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? ☐ Yes ☒ No

If “Yes,” continue 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? ☐ Yes ☒ No

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? ☐ Yes ☒ No

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 u. $ __________

13 Did the transferor transfer property described in section 367(d)(4)? ☐ Yes ☒ No

If “No,” skip Section C and questions 14a through 15.

Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals
Part IV  Additional Information Regarding Transfer of Property (see instructions)

14a 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

14b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  
    Yes  No

14c 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

14d 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) u $

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

Supplemental Part III Information Required To Be Reported (see instructions)

16a Did a domestic corporation make a distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  
    Yes  No

16b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) u $

16c 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

17 Type of nonrecognition transaction (see instructions) u IRC SECTION 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)  
      Yes  No

   b Gain recognition under section 904(f)(5)(F)  
      Yes  No

   c Recapture under section 1503(d)  
      Yes  No

   d Exchange gain under section 987  
      Yes  No

19 Did this transfer result from a change in entity classification?  
    Yes  No

20a 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) u $

   c 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 covered by section 367(e)(1)? See instructions  
    Yes  X  No
Part I  U.S. Transferor Information (see instructions)

Name of transferor: THE SAINT PAUL FOUNDATION

Identifying number: 41–6031510

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.

   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 [ ] 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  Identifying number


   c  If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? [ ] Yes [ ] No

      If not, list the name and employer identification number (EIN) of the parent corporation.

      Name of parent corporation  EIN of parent corporation

   d  Have basis adjustments under section 367(a)(4) been made? [ ] Yes [ ] 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.

   a  List the name and EIN of the transferor’s partnership.

      Name of partnership  EIN of partnership

      AETHER REAL ASSETS II, L.P.  45–3359493

   b  Did the partner pick up its pro rata share of gain on the transfer of partnership assets? [ ] Yes [x] No

   c  Is the partner disposing of its entire interest in the partnership? [x] Yes [ ] No

   d  Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? [ ] Yes [x] No

Part II  Transferee Foreign Corporation Information (see instructions)

4  Name of transferee (foreign corporation)

      FORGE OIL & GAS LIMITED

5a  Identifying number, if any

5b  Reference ID number (see instructions)

6  Address (including country)

      2200, 840–7TH AVENUE SW  ALBERTA

      CALGARY  CA  T2P 3G2  CANADA

7  Country code of country of incorporation or organization (see instructions)

      CA

8  Foreign law characterization (see instructions)

      CORPORATION

9  Is the transferee foreign corporation a controlled foreign corporation? [ ] Yes [x] No

For Paperwork Reduction Act Notice, see separate instructions.

DAA
**Part III Information Regarding Transfer of Property (see instructions)**

### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**10** Was cash the only property transferred? [ ] Yes [x] No

If "Yes," skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>FOREIGN CURRENCY – CAD</td>
<td>2,486</td>
<td>2,486</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td>2,486</td>
<td>2,486</td>
<td></td>
</tr>
</tbody>
</table>

**11** Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [x] No

**12a** Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? [ ] Yes [x] No

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? [ ] Yes [x] No

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? [ ] Yes [x] No

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 u $ __________

**13** Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [x] No

If "No," skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm’s length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
14a 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? ☐ Yes ☐ No

c 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) u $

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

Supplemental Part III Information Required To Be Reported (see instructions)

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 ________ %  (b) After ________ %

17 Type of nonrecognition transaction (see instructions) u IRC SECTION 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) ☐ Yes ☐ No

b Gain recognition under section 904(f)(5)(F) ☐ Yes ☐ No

c Recapture under section 1503(d) ☐ Yes ☐ No

d Exchange gain under section 987 ☐ Yes ☐ No

19 Did this transfer result from a change in entity classification? ☐ Yes ☐ No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

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) u $

c 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 covered by section 367(e)(1)? See instructions

☐ Yes ☐ No
Form 926
(Rev. November 2018)

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

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

u 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

THE SAINT PAUL FOUNDATION

Identifying number 41-6031510

1  Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? Yes □ No □

2  If the transferee 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 □ 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  Identifying number

       ____________________________  ____________________________

       ____________________________  ____________________________

       ____________________________  ____________________________

       ____________________________  ____________________________

   c  If the transferee was a member of an affiliated group filing a consolidated return, was it the parent corporation? Yes □ No □

       If not, list the name and employer identification number (EIN) of the parent corporation.

       Name of parent corporation  EIN of parent corporation

       ____________________________  ____________________________

       ____________________________  ____________________________

       ____________________________  ____________________________

       ____________________________  ____________________________

   d  Have basis adjustments under section 367(a)(4) been made? Yes □ No □

3  If the transferee 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.

   a  List the name and EIN of the transferor’s partnership.

       Name of partnership  EIN of partnership

       AETHER REAL ASSETS II, L.P.  45-3359493

   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 □ No □

   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)

   TEMPUS ENERGY LTD

5a  Identifying number, if any

6  Address (including country)

   1830, 407-2ND STREET SW  ALBERTA

   CALGARY  CA  T2P 2Y3  CANADA

5b  Reference ID number (see instructions)

   TEMPUS

7  Country code of country of incorporation or organization (see instructions)

   CA

8  Foreign law characterization (see instructions)

   CORPORATION

9  Is the transferee foreign corporation a controlled foreign corporation? Yes □ No □

For Paperwork Reduction Act Notice, see separate instructions.

DAA
### Part III  Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 **Was cash the only property transferred?**  
   If “Yes,” skip the remainder of Part III and go to Part IV.

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td>FOREIGN CURRENCY – CAD</td>
<td>11,038</td>
<td>11,038</td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals 11,038 11,038

11 **Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?**  
   If “Yes,” go to line 12b.

12a **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 u $**

13 **Did the transferor transfer property described in section 367(d)(4)?**  
   If “No,” skip Section C and questions 14a through 15.

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals  

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Form 926 (Rev. 11-2018)
14a 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 [x] No

b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? ................................................................. [ ] Yes [x] No

c 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 [x] 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 [x] No

Supplemental Part III Information Required To Be Reported (see instructions)


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 ________ % (b) After ________ %

17 Type of nonrecognition transaction (see instructions) IRC SECTION 351

18 Indicate whether any transfer reported in Part III is subject to any of the following.

<table>
<thead>
<tr>
<th>Type of Nonrecognition Transaction</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>a Gain recognition under section 904(f)(3)</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>b Gain recognition under section 904(f)(5)(F)</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>c Recapture under section 1503(d)</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>d Exchange gain under section 987</td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>

19 Did this transfer result from a change in entity classification? ................................................................. [ ] Yes [x] No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions.

If “Yes,” complete lines 20b and 20c.

<table>
<thead>
<tr>
<th>Type of Distribution Property</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>a Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) $ ____________________</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>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)?</td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>

21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions.

If “Yes,” complete lines 20b and 20c.

<table>
<thead>
<tr>
<th>Type of Domestic Corporation Distribution</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>a Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.</td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>

---

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

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

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? 
   - Yes [ ] No [x]

2. If the transferee was a corporation, complete questions 2a through 2d.
   a. Did the transferee remain in existence after the transfer? 
      - Yes [ ] No [x]
   b. If not, list the controlling shareholder(s) and their identifying number(s).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>
   c. Have basis adjustments under section 367(a)(4) been made? 
      - Yes [ ] No [x]

3. If the transferee 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.
   a. Did the partner pick up its pro rata share of gain on the transfer of partnership assets? 
      - Yes [ ] No [x]
   b. Is the partner disposing of its entire interest in the partnership? 
      - Yes [ ] No [x]
   c. Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? 
      - Yes [x] No [ ]

4. Address (including country)
   - 1100, 520–5TH AVENUE SW
   - CALGARY CA T2P 3R7 CANADA

5. Country code of country of incorporation or organization (see instructions)
   - CA

6. Foreign law characterization (see instructions)
   - CORPORATION

7. Is the transferee foreign corporation a controlled foreign corporation? 
   - Yes [x] No [ ]

For Paperwork Reduction Act Notice, see separate instructions.

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

DAA

Attachment Sequence No. 128
## Part III: Information Regarding Transfer of Property (see instructions)

### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
   [ ] Yes  [X] No

If "Yes," skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td>FOREIGN CURRENCY – CAD 46,707</td>
<td>46,707</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property</td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>(not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Property with built-in loss |                      |                             |                                          |                         |                                |

Totals

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
   [ ] Yes  [X] No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
   [ ] Yes  [X] No

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?  
   [ ] Yes  [X] No

c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?  
   [ ] Yes  [X] No

d Enter the transferred loss amount included in gross income as required under section 911:  
   $ ____________________________

13 Did the transferor transfer property described in section 367(d)(4)?  
   [ ] Yes  [X] No

If "No," skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

---

DAA
**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 _____ %  (b) After _____ %

17  Type of nonrecognition transaction (see instructions) or IRC SECTION 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) ☐ Yes ☑ No
   b  Gain recognition under section 904(f)(5)(F) ☑ Yes ☑ No
   c  Recapture under section 1503(d) ☑ Yes ☑ No
   d  Exchange gain under section 987 ☑ Yes ☑ No

19  Did this transfer result from a change in entity classification?
    ☐ Yes ☐ No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions.
    ☐ Yes ☑ 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) or $ ______
    ☐ Yes ☑ No
   c  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 covered by section 367(e)(1)? See instructions.
    ☐ Yes ☑ No
Part I  U.S. Transferor Information  
Name of transferor: THE SAINT PAUL FOUNDATION 
Identifying number: 41-6031510

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.
   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 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  
   Identifying number

   c. If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? Yes No
      If not, list the name and employer identification number (EIN) of the parent corporation.

   Name of parent corporation  
   EIN of parent corporation

   d. Have basis adjustments under section 367(a)(4) been made? Yes 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.
   a. List the name and EIN of the transferor’s partnership.

   Name of partnership  
   EIN of partnership

   B. HITHER REAL ASSETS II, L.P.  45-3359493

   b. Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Yes X 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 established securities market? Yes X No

Part II  Transferee Foreign Corporation Information  
Name of transferee (foreign corporation)  
VESTA ENERGY CORP

4. Name of transferee (foreign corporation)  
VESTA ENERGY CORP

5a. Identifying number, if any  

5b. Reference ID number  
(see instructions)  
VESTA

6. Address (including country)  
2200, 520-3RD AVE SW  
ALBERTA

   CALGARY  CA  T2P 0R3  CANADA

7. Country code of country of incorporation or organization (see instructions)  
CA

8. Foreign law characterization (see instructions)  
CORPORATION

9. Is the transferee foreign corporation a controlled foreign corporation? Yes X No

For Paperwork Reduction Act Notice, see separate instructions.
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
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<th>(e) Gain recognized on transfer</th>
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</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 **Was cash the only property transferred?**

- [ ] Yes
- [x] No

If "Yes," skip the remainder of Part III and go to Part IV.

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
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<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>FOREIGN CURRENCY - CAD</td>
<td>42,467</td>
<td>42,467</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Property with built-in loss</th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
</table>

| Totals                      |                        |                        |                           |                        | 42,467                          |

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Totals |                        |                        |                |                                           |                        |                                                          |

11 **Was the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?**

- [ ] Yes
- [x] No

12a **Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?**

- [ ] Yes
- [x] No

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?**

- [ ] Yes
- [ ] No

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?**

- [ ] Yes
- [ ] No

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 u $**

- [ ] Yes
- [ ] No

13 **Did the transferor transfer property described in section 367(d)(4)?**

If "No," skip Section C and questions 14a through 15.
Part IV  Additional Information Regarding Transfer of Property (see instructions)

14a  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?  Yes  No

c  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

Supplemental Part III Information Required To Be Reported (see instructions)

16  Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.
   (a) Before  %  (b) After  %

17  Type of nonrecognition transaction (see instructions)  IRC SECTION 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)  Yes  No
   b  Gain recognition under section 904(f)(5)(F)  Yes  No
   c  Recapture under section 1503(d)  Yes  No
   d  Exchange gain under section 987  Yes  No

19  Did this transfer result from a change in entity classification?  Yes  No

20a  Did a domestic corporation make a distribution of property covered by section 367(e)(2)?  Yes  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) $ .
   c  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 covered by section 367(e)(1)?  Yes  No

Form 926 (Rev. 11-2018)
**Part I  U.S. Transferor Information (see instructions)**

Name of transferor: **THE SAINT PAUL FOUNDATION**

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?</td>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td>2 If the transferor was a corporation, complete questions 2a through 2d.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>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?</td>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td>b Did the transferor remain in existence after the transfer?</td>
<td>☐</td>
<td>☑</td>
</tr>
<tr>
<td>If not, list the controlling shareholder(s) and their identifying number(s).</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
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<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? | ☐ | ☑ |
| If not, list the name and employer identification number (EIN) of the parent corporation. | | |

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| d Have basis adjustments under section 367(a)(4) been made? | ☐ | ☑ |

| 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. | | |
| a List the name and EIN of the transferor’s partnership. | | |

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td>AETHER REAL ASSETS III, L.P.</td>
<td>46-3402754</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? | ☐ | ☑ |
| c 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 established securities market? | ☐ | ☑ |

**Part II  Transferee Foreign Corporation Information (see instructions)**

4 Name of transferee (foreign corporation): **AJ LUCAS GROUP LIMITED**

<table>
<thead>
<tr>
<th>Address (including country)</th>
<th>Country code of country of incorporation or organization (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 EIZABETH PLAZA</td>
<td>AS NSW 2060 AUSTRALIA</td>
</tr>
</tbody>
</table>

5a Identifying number, if any: ☐ | ☑ |

5b Reference ID number (see instructions): **AJLUCAS1**

6 Foreign law characterization (see instructions): **CORPORATION**

9 Is the transferee foreign corporation a controlled foreign corporation? | ☐ | ☑ |
**Part III Information Regarding Transfer of Property (see instructions)**

**Section A—Cash**

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
If "Yes," skip the remainder of Part III and go to Part IV.  

**Section B—Other Property (other than intangible property subject to section 367(d))**

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>11/18/19</td>
<td>DEBT PRINCIPAL &amp; INTEREST</td>
<td>2,690</td>
<td>2,690</td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td>2,690</td>
<td>2,690</td>
<td></td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
If "Yes," go to line 12a.  

12a 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 911 u $  
13 Did the transferor transfer property described in section 367(d)(4)?  
If "No," skip Section C and questions 14a through 15.  

**Section C—Intangible Property Subject to Section 367(d)**

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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Form 926 (Rev. 11-2018)
Part IV  Additional Information Regarding Transfer of Property (see instructions)

14a 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?  
Yes  No

c 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

Supplemental Part III Information Required To Be Reported (see instructions)

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 %  (b) After %

17 Type of nonrecognition transaction (see instructions)  
IRC SECTION 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)  
Yes  No

b Gain recognition under section 904(f)(5)(F)  
Yes  No

c Recapture under section 1503(d)  
Yes  No

d Exchange gain under section 987  
Yes  No

19 Did this transfer result from a change in entity classification?  
Yes  No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions  
Yes  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) $  

20c 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 covered by section 367(e)(1)? See instructions  
Yes  No
**Part I  U.S. Transferor Information (see instructions)**

**Name of transferor**

<table>
<thead>
<tr>
<th>THE SAINT PAUL FOUNDATION</th>
<th>41–6031510</th>
</tr>
</thead>
</table>

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? [ ] Yes [x] No
2. If the transferee was a corporation, complete questions 2a through 2d.
   a. If the transfer was a section 361(a) or (b) transfer, was the transferee controlled (under section 368(c)) by five or fewer domestic corporations? [ ] Yes [ ] No
   b. Did the transferee remain in existence after the transfer? [ ] Yes [x] No
   If not, list the controlling shareholder(s) and their identifying number(s).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

3. If the transferee was a member of an affiliated group filing a consolidated return, was it the parent corporation? [ ] Yes [ ] No
   If not, list the name and employer identification number (EIN) of the parent corporation.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

4. Have basis adjustments under section 367(a)(4) been made? [ ] Yes [ ] No

**Part II  Transferee Foreign Corporation Information (see instructions)**

4. Name of transferee (foreign corporation)

<table>
<thead>
<tr>
<th>COMMONFUND CAPITAL NATURAL RESOURCE</th>
<th>26–3180228</th>
</tr>
</thead>
</table>

5a. Identifying number, if any

<table>
<thead>
<tr>
<th>[x] Yes</th>
<th>98–1194788</th>
</tr>
</thead>
</table>

5b. Reference ID number

<table>
<thead>
<tr>
<th>(see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

6. Address (including country)

<table>
<thead>
<tr>
<th>EAST WING, TRAFALGAR COURT</th>
</tr>
</thead>
<tbody>
<tr>
<td>ST PETER PORT</td>
</tr>
</tbody>
</table>

7. Country code of country of incorporation or organization (see instructions)

| GK |

8. Foreign law characterization (see instructions)

<table>
<thead>
<tr>
<th>CORPORATION</th>
</tr>
</thead>
</table>

9. Is the transferee foreign corporation a controlled foreign corporation? [ ] Yes [x] No

For Paperwork Reduction Act Notice, see separate instructions.
**Part III Information Regarding Transfer of Property** (see instructions)

### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? 

If "Yes," skip the remainder of Part III and go to Part IV. 

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>12/31/18</td>
<td>STOCK &amp; SECURITIES</td>
<td>468,987</td>
<td>468,987</td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td>468,987</td>
<td>468,987</td>
<td></td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? 

If "Yes," go to line 12b. 

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? 

If "Yes," continue 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 911 $ | |

13 Did the transferor transfer property described in section 367(d)(4)?  

If "No," skip Section C and questions 14a through 15. 

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Additional Information Regarding Transfer of Property

14a 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?  
   Yes ☐ No ☐

c 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) u $  

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 ☐

Supplemental Part III Information Required To Be Reported (see instructions)

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 _____%  (b) After _____%  

17 Type of nonrecognition transaction (see instructions) u IRC SECTION 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 1503(d)  
   d Exchange gain under section 987  

19 Did this transfer result from a change in entity classification?  
   Yes ☐ No ☐

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
   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) u $  
   c 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)?  

21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions
Part I  U.S. Transferor Information (see instructions)

Name of transferor: THE SAINT PAUL FOUNDATION

Identifying number: 41-6031510

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? Yes [ ] No [x]

2 If the transferee 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 [ ] No [x]
   
   b Did the transferor remain in existence after the transfer? Yes [ ] No [x]

   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 [ ] No [x]

   If not, list the name and employer identification number (EIN) of the parent corporation.

   Name of parent corporation | EIN of parent corporation
   ---------------------------|-------------------------
   
   

   d Have basis adjustments under section 367(a)(4) been made? Yes [ ] No [x]

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.

   a List the name and EIN of the transferor’s partnership.

   Name of partnership | EIN of partnership
   ---------------------|-------------------
   COMMONFUND CAPITAL NATURAL RESOURCE | 26-3180228

   b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Yes [ ] No [x]

   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 established securities market? Yes [ ] No [x]

Part II  Transferee Foreign Corporation Information (see instructions)

4 Name of transferee (foreign corporation):

   EXCELLENCE LOGGING GUERNSEY CO LTD

5a Identifying number, if any

   5b Reference ID number (see instructions)

   CORPORATION

6 Address (including country):

   EAST WING, TRAFALGAR COURT
   ST PETER PORT, GUERNSEY GY1 3PP

7 Country code of country of incorporation or organization (see instructions)

   GK

8 Foreign law characterization (see instructions)

   Yes [ ] No [x]

For Paperwork Reduction Act Notice, see separate instructions.
### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? [ ] Yes [X] No

If "Yes," skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date oftransfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>04/27/18</td>
<td>STOCK &amp; SECURITIES</td>
<td>14,213</td>
<td>14,213</td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>14,213</td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [X] No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? [ ] Yes [X] No

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? [ ] Yes [ ] No

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? [ ] Yes [ ] No

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 u $________________

13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [X] No

If "No," skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

DAA
Part IV

14a 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? Yes ☐ No ☐

c 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) u $.

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 ☐

Supplemental Part III Information Required To Be Reported (see instructions)

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 % (b) After %

17 Type of nonrecognition transaction (see instructions) u IRC SECTION 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) Yes ☐ No ☐

b Gain recognition under section 904(f)(5)(F) Yes ☐ No ☐

c Recapture under section 1503(d) Yes ☐ No ☐

d Exchange gain under section 987 Yes ☐ No ☐

19 Did this transfer result from a change in entity classification? Yes ☐ No ☐

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions Yes ☐ 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) u $.

c 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 covered by section 367(e)(1)? See instructions Yes ☐ No ☐