Form **8937**(December 2017) Department of the Treasury Internal Revenue Service

Report of Organizational Actions Affecting Basis of Securities

► See separate instructions.

OMB No. 1545-0123

Part I Reporting I	ssuer						
1 Issuer's name					2 Issuer's employer identification number (EIN)		
Picton Mahoney Income O 3 Name of contact for add			FOREIGNUS				
3 Name of contact for add	allional information		5 Email address of contact				
ARTHUR GALLOWAY			(416) 955-4108		agalloway@pictonmahoney.com		
6 Number and street (or P.O. box if mail is not delivered to street address) of contact					7 City, town, or post office, state, and ZIP code of contact		
33 YONGE STREET, STE. 8	330		TORONTO, ONTARIO M5E 1G4				
8 Date of action							
SEE BELOW 10 CUSIP number	44 Carial number		'RETURN OF CAPITAL"				
10 COSIP number	11 Serial number(S)	12 Ticker symbol		13 Account number(s)		
N/A	N/A		N/A		N/A		
		ch additiona		d. See bacl	k of form for additional questions.		
					nst which shareholders' ownership is measured for		
_				_	THROUGHOUT THE 2020 TAXABLE YEAR		
15 Describe the quantitat	ive effect of the ora	anizational ac	tion on the basis of the s	security in th	e hands of a U.S. taxpayer as an adjustment per		
share or as a percenta	_	ariizatioriai ac	tion on the basis of the s	security in th	e nands of a 0.5. taxpayer as an adjustment per		
THE ADJUSTMENT TO A U	_	ST BASIS IS	AS FOLLOWS:				
				00 PER UNI	T, Series Q 0.00000000 PER UNIT,		
Series UA 0.15661720 PER					,		
	·						
40 - Danielle Herritale Isl		and a small than	data that are a dath a	alas Ialias a	and the second of the second the		
Describe the calculation valuation dates ► N/A		basis and the	data that supports the ca	alculation, s	such as the market values of securities and the		
valuation dates $ ightharpoonup N/A$							

Part		Organizational Action (continued	d)				
			()				
		applicable Internal Revenue Code section	n(s) and subsection(s) u	pon which the tax tr	reatment is based	-	
IRC SE	CHOI	N 301(c)(2), 312 AND 316					
18 C	an an	y resulting loss be recognized? ► N/A					
19 P	rovide	any other information necessary to imple	ement the adjustment. s	uch as the reportab	e tax vear ► N/A		
			, .		<u>- 111 </u>		
	Unde	er penalties of perjury, I declare that I have exa f, it is true, correct, and complete. Declaration	amined this return, including of preparer (other than office	g accompanying sched er) is based on all infor	dules and statements mation of which prepa	, and to the best of arer has any knowl	of my knowledge and ledge.
Sign	500	, 1.10 1.100, 00.1.000, 0.1.0 00.1.1.010.1.2.00.1.010.1.	or proparer (ourse unair error	o., 10 baooa o., a.,o.	maneri er miller propi	are. riae arry rare rr	ougo.
Here	Cian	atura N			Data N		
	Signa	ature ►			Date ►		
	Print	your name ▶			Title ▶		
Paid	,	Print/Type preparer's name	Preparer's signature	Car Paple	Date	Check ✓ if	PTIN
Prepare	arer	GREGORY PAPINKO		apro-	3/16/2021	self-employed	P01452981
Use (Firm's name ► PRICEWATERHOUS	ECOOPERS LLP			Firm's EIN ▶	98-0189320
		Firm's address ► 18 YORK STREET, S					(416) 863-1133
Send F	orm 89	937 (including accompanying statements)) to: Department of the T	reasury, Internal Re	venue Service, Ogo	den, UT 84201-0	0054