

Service Specific Terms and Conditions:

Individual Tax Compliance - United States

Virtual Currency

The Internal Revenue Service ("IRS") guidance addressing the taxation of virtual currency transactions provides that virtual currency (such as Bitcoin, Ether, etc.) is treated as property for federal tax purposes. Therefore, general tax principles that apply to property transactions must be applied to exchanges of virtual currencies, which include cryptocurrencies and non-crypto virtual currencies. Generally, U.S. taxpayers must report all sales, exchanges, and other dispositions of any virtual currency. An exchange of a virtual currency includes the use of the virtual currency to pay for or purchase goods, services, or other property, including another virtual currency such as exchanging Bitcoin for Ether. This obligation applies regardless of whether the account is held in the U.S. or abroad. You must report virtual currency transactions on your return, regardless of whether you received a payee statement for the transaction (such as a Form W-2, Form 1099, etc.) or not. To the extent that you engaged in any virtual currency transactions during the year, please provide the details to us for consideration in connection with the preparation of your tax return. If you received a reporting virtual currency transactions letter from the IRS or another tax authority, please provide us with a copy of that letter. We will contact you if we believe additional work needs to be conducted related to your virtual currency transactions and the related fees, if any, for such additional work.

Reportable Transaction Disclosures and Listing Requirements

Certain federal and state regulations require taxpayers to disclose their participation in certain reportable transactions to the taxing authorities. You shall advise Vialto if you determine that any matter covered by this engagement letter is a reportable transaction that is required to be disclosed. Certain federal and state regulations also require Vialto to submit information returns and maintain lists of certain client engagements if Vialto is a material advisor to clients that have participated in a reportable transaction. Therefore, if Vialto determines, after consultation with you, that you has participated in a transaction causing Vialto to have a registration and/or list maintenance obligation, Vialto will place Client's name and other required information on a list. Vialto will contact you if Vialto is required to provide your name to the U.S. Internal Revenue Service or any state in connection with any matter under this engagement letter.

Certain laws and/or regulations, including those adopted because of the European Union Council Directive (EU) 2018/822 of May 25, 2018, amending Directive 2011/16/EU, require advisors or taxpayers to disclose certain transactions to a tax authority. These laws may require disclosure of certain transactions by Vialto or by other Vialto Firms. The parties shall cooperate with each other to allow the filing of such disclosures. If Vialto reasonably believes it is required to make such disclosure, Vialto will make the disclosure, or where applicable, coordinate with other Vialto Firms, if disclosure is required by other Vialto Firms. Where Vialto or other Vialto Firms are required to make such a disclosure, where practicable, Vialto will share that disclosure with you before it is filed.

The work related to this section is not within the scope of tax services provided under this engagement letter, and our fee for performing these services will be billed separately based on the hourly rates specified below.

FinCEN Form 114 (Report of Foreign Bank and Financial Accounts)

Federal law requires that certain individuals and entities report financial interests in, and signatory authority or certain other authority over, foreign financial accounts with more than \$10,000 in aggregate value in a calendar year on FinCEN Form 114, Report of Foreign Bank and Financial Accounts. This form is not filed with a tax return. Instead this form must be filed electronically with the U.S. Department of the Treasury through the Financial Crimes Enforcement Network's ("FinCEN's") BSA E-filing System by April 15 of the year following the calendar year in which aggregate amounts held in the foreign financial accounts meet the threshold. The definition of financial accounts is broadly defined and includes certain interests held indirectly. Failure to comply with these laws could result in significant civil and criminal penalties.

The work related to this section is not within the scope of tax services provided under this engagement letter, and our fee for performing these services will be billed separately based on the hourly rates specified below.

IRS Form 8938 (Statement of Specified Foreign Financial Assets)

Federal law (IRC Section 6038D) requires that certain individuals include in their income tax returns for any year, a report of all specified foreign financial assets held by them during that year. This reporting, on IRS Form 8938, is required when the individual's specified foreign financial assets exceed a specific threshold during any year. The data gathering, valuation, and associated reporting is complex.

The work related to this section is not within the scope of tax services provided under this engagement letter, and our fee for performing these services will be billed separately based on the hourly rates specified below.

Gifts and Gift Tax Return Filing Requirement

If you made non-charitable gifts during the tax year that are covered under our services, please advise us. If you made gifts of more than \$15,000 to any donee, the filing of a gift tax return will likely be required. Gifts made in trust may also generate a gift tax return filing requirement.

The work related to this section is not within the scope of tax services provided under this engagement letter, and our fee for performing these services will be billed separately based on the hourly rates specified below.