



**Part II** Organizational Action (continued)

**17** List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ \_\_\_\_\_  
Sections 301, 302, and 1001 of the Code.

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**18** Can any resulting loss be recognized? ▶ To the extent a Shareholder satisfies the requirements of Section 302(b) of the Code, the Redemption would result in a recognizable loss for U.S. federal income tax purposes to the Shareholder to the extent their tax basis in Series D Preferred Stock surrendered exceeds the cash received in exchange therefor.

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**19** Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ \_\_\_\_\_  
The Company does not provide tax advice to its Shareholders. The taxable year for the Redemption is 2024 for Shareholders reporting on a calendar basis. For Shareholders reporting taxable income on a basis other than the calendar year, the proper taxable year includes July 8, 2024.

For more information related to the Redemption, please see Form 8-K filed with the Securities and Exchange Commission on July 8, 2024, which can be found at the following address:  
<https://www.sec.gov/ix?doc=/Archives/edgar/data/759944/000075994424000134/cfg-20240708.htm>

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Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

**Sign Here**  
Signature ▶  Date ▶ 8/7/2024  
Print your name ▶ Yanina Reid Title ▶ Head of Tax, SVP

<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶				Firm's EIN ▶
	Firm's address ▶				Phone no.