



**MALIN CORPORATION PLC**  
**EIN: 98-1313350**  
**PASSIVE FOREIGN INVESTMENT COMPANY ("PFIC") ANNUAL INFORMATION**  
**STATEMENT**  
**FOR TAXABLE YEAR-ENDED DECEMBER 31, 2022**

PFIC Name: Malin Corporation plc  
PFIC Address: The Lennox Building, Richmond Street South, Dublin 2, Ireland  
EIN: 98-1313350  
REFERENCE ID NUMBER: MCORP

- 1) This PFIC Annual Information Statement applies to the taxable year of Malin Corporation plc beginning on January 1, 2022 and ending on December 31, 2022 ("Tax Year 2022"). It is being provided to you pursuant to Treas. Reg. §1.1295-1(g)(1).
- 2) Malin Corporation plc has the following ordinary earnings and net capital gain for Tax Year 2022:

Ordinary Earnings: **NONE**  
Net Capital Gain: **EUR 73,356,109**

- 3) The amount of cash and fair market value ("FMV") of other property distributed or deemed distributed by Malin Corporation plc during Tax Year 2022 is as follows:

Cash: **NONE**  
FMV of Property: **NONE**

- 4) Malin Corporation plc will permit the Shareholder to inspect and copy the PFIC's permanent books of account, records, and such other documents as may be maintained by the PFIC that are necessary to establish that the PFIC's ordinary earnings and net capital gain, as provided in §1293(e), are computed in accordance with U.S. income tax principles.

**Andrea Stafford**

**Head of Finance, Malin Corporation plc**

**14 April, 2023**

Malin Corporation plc, The Lennox Building, Richmond Street South, Dublin 2, Ireland  
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Directors: L. Daniel (Chairman), J.M. Cosséry (Belgium), R. Mareel (Belgium), D. Lyons, C. Pedrick (UK), K. Drejer (Denmark)  
Registered in Ireland, No: 554442



**NIDUS LABORATORIES IRELAND LTD**  
**EIN: N/A**  
**PASSIVE FOREIGN INVESTMENT COMPANY ("PFIC") ANNUAL INFORMATION**  
**STATEMENT**  
**FOR TAXABLE YEAR-ENDED DECEMBER 31, 2022**

PFIC Name: Nidus Laboratories Ireland Ltd  
PFIC Address: The Lennox Building, Richmond Street South, Dublin 2, Ireland  
EIN: N/A  
REFERENCE ID NUMBER: NLIREL  
% HELD BY MALIN CORPORATION PLC: 100%

1) This PFIC Annual Information Statement applies to the taxable year of Nidus Laboratories Ireland Ltd beginning on January 1, 2022 and ending on December 31, 2022 ("Tax Year 2022"). It is being provided to you pursuant to Treas. Reg. §1.1295-1(g)(1).

2) Nidus Laboratories Ireland Ltd has the following ordinary earnings and net capital gain for Tax Year 2022:

Ordinary Earnings: **NONE**  
Net Capital Gain: **NONE**

3) The amount of cash and fair market value ("FMV") of other property distributed or deemed distributed by Nidus Laboratories Ireland Ltd during Tax Year 2022 is as follows:

Cash: **NONE**  
FMV of Property: **NONE**

4) Nidus Laboratories Ireland Ltd will permit the Shareholder to inspect and copy the PFIC's permanent books of account, records, and such other documents as may be maintained by the PFIC that are necessary to establish that the PFIC's ordinary earnings and net capital gain, as provided in §1293(e), are computed in accordance with U.S. income tax principles.

**Andrea Stafford**

**Head of Finance, Malin Corporation plc**

**14 April, 2023**