

**PASSIVE FOREIGN INVESTMENT COMPANY
("PFIC") ANNUAL INFORMATION
STATEMENT**

[INVESTOR NAME]

Name of PFIC: **JZ Capital Partners Limited**

(1) This Information Statement applies to the taxable year of PFIC beginning on March 1, 2022 and ending on February 28, 2023.

(2) [INVESTOR] has the following pro-rata share of the ordinary earnings and net capital gain of JZ Capital Partners Limited for the taxable year specified in paragraph (1):

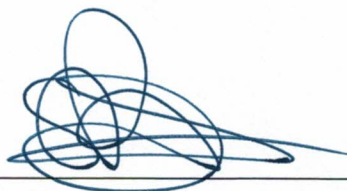
<i>Ordinary Earnings:</i>	<i>NONE</i>
<i>Net Capital Gain:</i>	<i>33,395,000</i>

(3) The amount of cash and fair market value of other property distributed or deemed distributed by JZ Capital Partners Limited to [INVESTOR] during the taxable year specified in paragraph (1) is as follows:

<i>Cash:</i>	<i>NONE</i>
<i>Fair Market Value of Property:</i>	<i>NONE</i>

(4) JZ Capital Partners Limited will permit the taxpayer to inspect and copy the permanent books of account, records and other documents as may be maintained by JZ Capital Partners Limited that are necessary to establish that the PFIC ordinary earnings and net capital gain, as provided in Section 1293(e) of the Internal Revenue Code, are computed in accordance with U.S. income tax principles.

By:



Sharon Parr, Chairman of the Audit
Committee of JZ Capital Partners Limited