

WHY INVEST IN QOZs?

- QOZs are economically distressed urban, suburban or rural communities where new investments, under certain conditions, may be eligible for preferential tax treatment.
- QOZs were devised to create opportunities and incentivize investment in low-income urban, suburban and rural communities throughout the nation.
- The Fund is a group of investment vehicles expected to invest in properties located in QOZs and is expected to be capitalized with investors' eligible capital gains from prior investments.
- Generally, QOF investors are eligible for the following tax benefits:
 - **Gain Deferral:** QOF investors may defer tax on prior eligible capital gains until the earlier of the date on which the QOF investment is sold or exchanged, or December 31, 2026.
 - **Gain Reduction:** Investors can have up to 15% of the prior eligible capital gain reduced if they hold the investment for at least seven years, or 10% of the prior eligible capital gain forgiven if they hold the investment for at least five years.
 - **Gain Elimination:** For investments held at least 10 years, the investor is generally eligible to increase his or her basis in the investment in the Fund to an amount equal to the fair market value of the investment on the date the investment is sold or exchanged, so long as the investment is sold on or before December 31, 2047.

Please refer to Additional Disclosures and Risks at the end of this presentation, as well as the Private Placement Memorandum – see Section XI. *Investment Considerations* – “Risk Factors”, for QOZ- and tax-specific risk factors.