

Sculptor

May 21, 2024

Attention: U.S. Shareholders of Sculptor Acquisition Corp I

IMPORTANT TAX NOTICE

Re: 2023 PFIC Status

This statement is provided for shareholders who are United States persons for purposes of the U.S. Internal Revenue Code. It is not relevant to other shareholders.

Sculptor Acquisition Corp I (or “the Company”) meets the Internal Revenue Code definition of a passive foreign investment company (“PFIC”) for the taxable year ended June 9, 2023. The Company is hereby making available PFIC Annual Information Statements for Sculptor Acquisition Corp I for their taxable years beginning on January 1, 2023 and ending on June 9, 2023 pursuant to the requirements of Treasury Regulation Section 1.1295-1(g)(1).

The PFIC Annual Information Statements contain information to enable you, should you choose, to elect to treat Sculptor Acquisition Corp I as a Qualified Electing Fund (“QEF”).

A U.S. shareholder who makes a QEF election for Sculptor Acquisition Corp I is required annually to include in his or her income or his or her pro rata share of the ordinary earnings and net capital gains for Sculptor Acquisition Corp I. The QEF election is made by completing and attaching Form 8621 for each PFIC to your federal income tax return filed by the due date of the return, including extensions.

U.S. shareholders are advised to consult with their tax advisors with respect to the 2023 PFIC Annual Information Statement.

Further information on PFIC rules is available on the internet at the Internal Revenue Service website, including the following pages:

Detailed information about PFICs and the QEF election: <https://www.irs.gov/instructions/i8621>

Instructions to complete Form 8621: <https://www.irs.gov/pub/irs-pdf/i8621.pdf>

Form 8621: <https://www.irs.gov/pub/irs-pdf/f8621.pdf>

THIS INFORMATION IS PROVIDED IN ORDER TO ASSIST SHAREHOLDERS IN MAKING CALCULATIONS AND DOES NOT CONSTITUTE TAX ADVICE. SHAREHOLDERS ARE ADVISED TO CONSULT THEIR OWN TAX ADVISORS CONCERNING THE OVERALL TAX CONSEQUENCES OF THE OWNERSHIP OF SCULPTOR ACQUISITION CORP I ARISING IN THEIR OWN PARTICULAR SITUATIONS UNDER THE UNITED STATES FEDERAL, STATE, LOCAL OR FOREIGN LAW.

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PFIC Annual Information Statement

Sculptor Acquisition Corp I

- 1) This Information Statement applies to the taxable year of Sculptor Acquisition Corp I beginning on January 1, 2023 and ending on June 9, 2023 (the “Taxable Year”).
- 2) Your pro rata share of Sculptor Acquisition Corp I’s ordinary earnings for the Taxable Year can be determined as follows:
 - i) If you owned Sculptor Acquisition Corp I’s shares for the entire period from January 1 through June 9, 2023, you should multiply the number of shares by the “Ordinary Income Per Share” amount below.

	Total Ordinary Income	Ordinary Income Per Share	Net Capital Gains
Class A Ordinary Shares	US\$ 2,457,268	US\$ 0.106838	US\$ 0.00
Class B Ordinary Shares	US\$ 0.00	US\$ 0.00	US\$ 0.00

- ii) If you did not own all of your Sculptor Acquisition Corp I shares for the entire 159 day period, your daily pro rata share of Sculptor Acquisition Corp I’s ordinary earnings is:

	Daily Ordinary Income Pro Rata Share	Net Capital Gains
Class A Ordinary Shares (January 1 – June 9, 2023)	US\$ 0.000672	US\$ 0.00
Class B Ordinary Shares (January 1 – June 9, 2023)	US\$ 0.00	US\$ 0.00

U.S. shareholders are advised to consult with their tax advisors with respect to the calculation of their pro rata share of Sculptor Acquisition Corp I’s ordinary earnings and net short term and long term capital gain for the Taxable Year.

- 3) The amount of cash and the fair market value of other property distributed or deemed distributed by Sculptor Acquisition Corp I during the Taxable Year are as follows:

Cash: US \$0.00
Fair Market Value of Property: US \$0.00

- 4) The Summary of Annual Information of Sculptor Acquisition Corp I is as follows:

- a) Description of each class of shares – **Class A and B Ordinary Shares**
- b) Total number of shares outstanding immediately before June 09, 2023
Liquidation:
 - i) Class A Ordinary Shares: **23,000,000**
 - ii) Class B Ordinary Shares: **5,750,000**

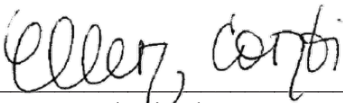
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c) Total FMV of Class A Ordinary Shares at June 9, 2023 – US\$ 10.52 per share.

- 5) Any shareholders making a QEF election will be permitted by Sculptor Acquisition Corp I to inspect and copy its permanent books of account, records, and such other documents as are maintained by Sculptor Acquisition Corp I that are necessary to establish that Sculptor Acquisition Corp I's ordinary earnings and net capital gain, as provided in section 1293(e) of the U.S. Internal Revenue Code, are computed in accordance with U.S. income tax principles, and to verify these amounts and your pro rata share thereof.

Sculptor Acquisition Corp I

Date: 05/23/2024

By: 
Authorized Representative