

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name Journey Beyond Holdings Ltd		2 Issuer's employer identification number (EIN)	
3 Name of contact for additional information Frank Dunsford	4 Telephone No. of contact 415-788-7020	5 Email address of contact frank.dunsford@hornblower.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact Pier 3 - The Embarcadero		7 City, town, or post office, state, and ZIP code of contact San Francisco, CA 94111	
8 Date of action July 3, 2024		9 Classification and description Transfer of equity of Journey Beyond Holdings Ltd to the Maples Trust	
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ On February 21, 2024, (the "Debtors" or collectively, "Hornblower") filed voluntary petitions for relief (the "Bankruptcy Filing") under Chapter 11 of Title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of Texas (the "Bankruptcy Court"). On June 7th, 2024 (the "Confirmation Date"), the Bankruptcy Court entered an order approving and confirming the Joining Chapter 11 Plan of Reorganization of Hornblower Holdings LLC. And its Debtor Affiliates, dated March 18, 2024 (the "Plan"). On July 3rd, 2024 (the "Effective Date"), Hornblower satisfied the conditions of the Plan and the Plan became effective. Unless otherwise defined herein, capitalized terms used herein are defined as used in the Plan or the Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Hornblower Holdings LLC. And its Debtor Affiliates, filed with the Bankruptcy Court on March 18, 2024 (the "Disclosure Statement"). In connection with this process, Journey Beyond Holdings Ltd transferred 100% of its equity interests to the Maples Trust for no consideration. Prior to the Petition Date, all issues relating to the JBIH Loans and the JBIH Intercompany Note were settled via the Restructuring Support Agreement to transfer 100% of the equity of Journey Beyond Holdings Ltd. to the Maples Trust for zero consideration. The Agreement was a settlement of any and all actual and potential disputes relating to the JBIH Loans and the JBIH Intercompany Note.

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ▶ As a result of the transaction, each holder of Existing Equity Interest (together or separately, a "Claim") exchanged its Claim without the right to receive consideration. For purposes of this section, a "U.S. Holder" means a beneficial owner of an Existing Equity Interest, that is: (a) an individual citizen or resident of the United States for U.S. federal income tax purposes; (b) a corporation (or other entity treated as a corporation for U.S. federal income tax purposes) created or organized under the laws of the United States, any State thereof, or the District of Columbia; (c) an estate the income of which is subject to U.S. federal income taxation regardless of the source of such income; or (d) a trust (i) if a court within the United States is able to exercise primary jurisdiction over the trust's administration and one or more United States persons have authority to control all substantial decisions of the trust or (ii) that has a valid election in effect under applicable Treasury regulations to be treated as a United States person. U.S. Holders are urged to consult their own tax advisors regarding the allocation and consideration received in satisfaction of their Claims, if any, and the U.S. federal income tax treatment of accrued but unpaid interest, as well as the character of any loss claimed with respect to accrued but unpaid interest previously included in gross income for U.S. federal income tax purposes.

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ A U.S. Holder of Existing Equity who is subject to treatment as a Taxable Transaction should recognize gain or loss equal to the difference between (a) the total fair market value of the New Journey Beyond Holdings Ltd Equity, and cash received in exchange for such portion of its Claim and (b) the U.S. Holder's adjusted tax basis in such portion of its Claim. The character of such gain or loss as capital gain or loss or as ordinary income or loss will be determined by a number of factors, including the tax status of the U.S. Holder, whether the Claim was purchased at a discount, and whether and to what extent the U.S. Holder previously has claimed a bad debt deduction with respect to its Claim. It is anticipated that the affected Holders will recognize a loss upon the transaction as they received no consideration in exchange for their existing equity interest.

Part II Organizational Action *(continued)*

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ Internal Revenue Code Sections 1001 and 165.

18 Can any resulting loss be recognized? ▶ A U.S. Holder of Existing Journey Beyond Holdings Ltd. Equity stock may be eligible for a worthless stock deduction pursuant to Section 165 of the Internal Revenue Code. The rules governing the character, timing, and amount of bad debt or worthless securities deductions place considerable emphasis on the facts and circumstances of the U.S. Holder, the obligor, and the instrument with respect to which a deduction is claimed. U.S. Holders of Existing Journey Beyond Holdings Ltd Equity, therefore, are urged to consult their tax advisors with respect to their ability to take such a deduction.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The adjustments to basis would be taken into account in the tax year of the holder during which the effective date occurred (i.e., July 3, 2024).

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 ▶ 8/15/2024

Paid Preparer Use Only	Print your name ▶ Frank Dunsford	Preparer's signature	Title ▶ CFO	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶			Firm's EIN ▶	
	Firm's address ▶			Phone no.	