

Report of Organizational Actions Affecting Basis of Securities

OMB No. 1545-0123

► See separate instructions.

Part I Reporting Issuer

1 Issuer's name Picton Mahoney Income Opportunities Fund		2 Issuer's employer identification number (EIN) FOREIGNUS	
3 Name of contact for additional information ARTHUR GALLOWAY	4 Telephone No. of contact (416) 955-4108	5 Email address of contact agalloway@pictonmahoney.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 33 YONGE STREET, STE. 320		7 City, town, or post office, state, and ZIP code of contact TORONTO, ONTARIO M5E 1G4	
8 Date of action SEE BELOW		9 Classification and description PAID A "RETURN OF CAPITAL" DISTRIBUTION	
10 CUSIP number N/A	11 Serial number(s) N/A	12 Ticker symbol N/A	13 Account number(s) N/A

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 ► **RETURN OF CAPITAL AS PART OF DISTRIBUTIONS THAT OCCURRED THROUGHOUT THE 2024 TAXABLE YEAR**

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 ► **THE ADJUSTMENT TO A UNITHOLDER'S COST BASIS IS AS FOLLOWS:**
Series A 0.00000000 PER UNIT ,Series F 0.33874717 PER UNIT ,Series I 0.00000000 PER UNIT ,Series O 0.14375920 PER UNIT ,
Series Q 0.27573345 PER UNIT ,Series UA 0.42926507 PER UNIT ,Series UF 0.47318198 PER UNIT

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 ► **N/A**

The information contained herein is being provided pursuant to the requirements of Section 6045B of the Internal Revenue Code of 1986, as amended. The information in this document does not constitute tax advice and should not be construed to take into account any shareholder's specific circumstances. Holders and nominees should consult their own tax advisors regarding the particular tax consequences of the organizational action (as described in this document) to them, including the applicability and effect of all U.S. federal, state, and local and foreign tax laws.

Part II **Organizational Action** *(continued)***17** List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ► _____**IRC SECTION 301(c)(2), 312 AND 316****18** Can any resulting loss be recognized? ► **N/A****19** Provide any other information necessary to implement the adjustment, such as the reportable tax year ► **N/A****Sign
Here**

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.

Signature ► _____ Date ► _____

Print your name ► _____ Title ► _____

**Paid
Preparer
Use Only**

Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
Firm's name ►			Firm's EIN ►	
Firm's address ►			Phone no.	