

## SPIN-OFF TAX BASIS ALLOCATION

April 1, 2024

To the Shareholders of LICT Corporation common stock:

As owners of LICT Corporation ("LICT") common stock, you have received a special distribution of 150 (one hundred fifty) shares of common stock of MacTen Corporation, ("MACT"), for each 1 (one) share of LICT common stock you owned as of the record date of August 15, 2023 ("Spin-off"). The distribution and the Federal income tax consequences of the distribution are discussed in the Information Statement dated August 31, 2023.

We believe that the spin-off should qualify as tax-free to LICT and its stockholders under Sections 368(a)(1)(D) and 355 of the Internal Revenue Code, as amended, although we have not obtained an opinion to that effect from our advisors. As a result of the tax-free nature of the MACT spin-off, the Federal income tax basis of your LICT common stock will need to be apportioned between your LICT common stock and the MACT common stock, based on their relative fair market values on the date of the distribution.

As there was a trading market in the MACT shares immediately following the spin-off, one possible method for determining the fair market value is to use the Volume-Weighted Average Price (VWAP) of LICT and MachTen Stock on the day after the distribution and allocate the pre-distribution basis proportionally. The VWAP of MACT stock of \$8.76 is multiplied by the 150 shares received, which equals \$1,314. This is then divided by the \$16,500 the VWAP of LICT to arrive at a MACT tax basis allocation percentage of 7.376%. The remaining pre-distribution federal tax basis of 92.624% is allocated to LICT shares.

The apportionment calculation may be illustrated as follows: Suppose you own 10 shares of LICT common stock with a \$1,000 tax basis per share for a total tax basis of \$10,000. Upon receipt of 1,500 shares of MACT common stock, your aggregate basis in the shares of LICT common stock would be reduced to approximately \$9,262 (92.624% times \$10,000), or \$926.24 per share (\$9,262 divided by 10 shares). Your aggregate basis in the shares of MACT common stock would be approximately \$738 (7.376% times \$10,000), or \$0.49 per share (\$738 divided by 1,500 shares).

While the Company believes that the above methodology is reasonable, it is not the only methodology that could be used for this purpose and may not be the most appropriate for all shareholders. Moreover, LICT cannot provide you with tax advice. The information in this document does not constitute tax advice. It does not purport to be complete or to describe the consequences that may apply to any particular shareholder or to any categories of shareholders. You should consult your tax adviser or the Internal Revenue Service regarding the application, if any, of this apportionment calculation to your particular circumstances, and how this information may appropriately be used for income tax purposes.

LICT Corporation

IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that the information contained herein does not constitute tax advice and was not intended or written to be used, and cannot be used, for the purpose of (i) avoiding tax-related penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any matter{s} addressed herein.