

2023 TAX DOCUMENTATION AND FILINGS

Summit Digital Solutions, Inc.

A Delaware Corporation

EIN: 47-3856291

1. CERTIFICATION OF TAX FILINGS

This document certifies that Summit Digital Solutions, Inc. (the "Company") has filed or will file all required federal, state, and local tax returns and reports for the fiscal year ending December 31, 2023, including but not limited to:

1.1 Federal Tax Filings

- Form 1120: U.S. Corporation Income Tax Return
- Form 941: Employer's Quarterly Federal Tax Return (Q1-Q4 2023)
- Form 940: Employer's Annual Federal Unemployment Tax Return
- Form W-2: Wage and Tax Statements (385 employees)
- Form 1099-NEC: Nonemployee Compensation (73 contractors)

1.2 State Tax Filings

- Delaware Corporation Income Tax Return
- State Income/Franchise Tax Returns in operating jurisdictions:
- California (Form 100)
- New York (Form CT-3)
- Texas (Form 05-158)
- Massachusetts (Form 355)
- Illinois (Form IL-1120)

2. TAX POSITIONS AND ELECTIONS

2.1 Federal Tax Status

The Company maintains C-Corporation status for federal tax purposes, having never made an S-Corporation election under Section 1362(a) of the Internal Revenue Code.

2.2 Research & Development Credits

The Company has claimed R&D tax credits under IRC Section 41 for qualifying research activities related to:

- Peak Performance Platform development
- Machine learning algorithm optimization
- IoT integration framework advancement
- Process automation systems architecture

2.3 Depreciation Elections

The Company has elected to apply:

- Section 179 expensing for qualifying equipment purchases
- Bonus depreciation under Section 168(k) for eligible assets
- MACRS depreciation for remaining depreciable assets

3. TAX COMPLIANCE REPRESENTATIONS

3.1 Filing Status

The Company hereby represents that:

- a) All tax returns filed are true, accurate, and complete
- b) No extensions are currently pending
- c) All required estimated tax payments have been made timely
- d) No tax audits are currently in progress

3.2 Tax Reserves

The Company maintains adequate reserves for:

- Federal income tax obligations
- State and local tax liabilities
- Foreign tax exposure
- Uncertain tax positions under ASC 740

4. INTERNATIONAL TAX MATTERS

4.1 Transfer Pricing

The Company maintains transfer pricing documentation for intercompany transactions with:

- Summit Digital Solutions UK Ltd.

- Summit Digital Solutions Canada ULC
- Summit Digital Solutions Australia Pty Ltd.

4.2 Foreign Tax Compliance

The Company certifies compliance with:

- FATCA reporting requirements
- International tax treaty obligations
- Country-by-country reporting under BEPS
- Foreign tax credit documentation

5. SALES AND USE TAX

5.1 Nexus Analysis

The Company maintains sales tax registrations in jurisdictions where:

- Physical presence exists
- Economic nexus thresholds are met
- Service delivery occurs

5.2 Collection and Remittance

The Company has implemented automated systems for:

- Sales tax calculation
- Use tax accrual
- Tax remittance
- Exemption certificate management

6. REPRESENTATIONS AND WARRANTIES

The Company hereby represents and warrants that:

1 All tax returns and reports referenced herein have been or will be filed within prescribed timeframes.

2 All taxes shown as due have been or will be paid when due.

3 No waivers of statutory limitations periods have been given.

4 All required records and documentation are maintained in accordance with applicable regulations.

7. AUTHORIZATION

IN WITNESS WHEREOF, the undersigned, being duly authorized, has executed this Tax Documentation and Filings certificate as of January 9, 2024.

SUMMIT DIGITAL SOLUTIONS, INC.

By: _

Name: Sarah Blackwell

Title: Chief Operating Officer

By: _

Name: David Chen

Title: Chief Financial Officer

ATTESTATION:

By: _

Name: Deloitte LLP

Title: Independent Auditor

Date: January 9, 2024