

**Attachment to Form 8023: Section E, Line 9 (1 of 9)**

**Section A-1—Purchasing Corporation**

1a. Name and address of purchasing corporation:

Lyra Bidco Limited  
40 Berkely Square, London, W1J 5AL, United Kingdom

1b. Employer identification number: [FOREIGN]

1c. Tax year ending: 04/30/2025 *[Note: For purposes of the Form 8023 and this attachment, the tax year ending listed for the Purchasing Corporation is in each case the tax year end of the Purchasing Corporation in its jurisdiction of incorporation.]*

1d. State or country of incorporation: United Kingdom

**Section A-2—Common Parent of Purchasing Corporation**

N/A

**Section B—Target Corporation**

3a. Name and address of target corporation:

Hipgnosis Holdings UK Limited  
27-28 Eastcastle Street, London, W1W 8DH, United Kingdom

3b. Employer identification number: 98-1806373

3c. Tax year ending: 03/31/2025 *[Note: For purposes of the Form 8023 and this attachment, the tax year ending listed for the Target Corporations is in each case the tax year end of such Target Corporation in its jurisdiction of incorporation.]*

3d. State or country of incorporation: United Kingdom

**Section C—Common Parent of Selling Consolidated Group, Selling Affiliate, S Corporation Shareholder, or U.S. Shareholder**

N/A

**5. Section D—General Information**

5a. Acquisition date: July 29, 2024

5b. What percentage of the target corporation stock was purchased:

(i) During the 12-month acquisition period? 100%

(ii) On the acquisition date? 100%

**Section E—General Information**

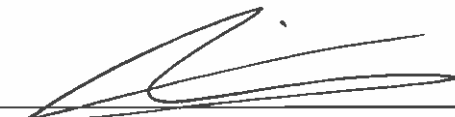
7. Check here to make a section 338 election (other than a section 338(h)(10) election) for the target corporation listed in Section B above   X  

9. Check here if this form is filed to make a section 338 election for any target corporation in addition to the one listed in Section B above   X  

\* \* \*

**Purchasing Corporation(s) Signature(s):**

Under penalties of perjury, I state and declare that I am authorized to make the election(s) on lines 6, 7, 8 and 9 on behalf of the purchasing corporation(s).

  
\_\_\_\_\_  
Signature of authorized person for purchasing corporation(s)

30-01-25 DIRECTOR  
Date Title

**Attachment to Form 8023: Section E, Line 9 (2 of 9)**

**Section A-1—Purchasing Corporation**

1a. Name and address of purchasing corporation:

Lyra Bidco Limited  
40 Berkely Square, London, W1J 5AL, United Kingdom

1b. Employer identification number: [FOREIGN]

1c. Tax year ending: 04/30/2025 *[Note: For purposes of the Form 8023 and this attachment, the tax year ending listed for the Purchasing Corporation is in each case the tax year end of the Purchasing Corporation in its jurisdiction of incorporation.]*

1d. State or country of incorporation: United Kingdom

**Section A-2—Common Parent of Purchasing Corporation**

N/A

**Section B—Target Corporation**

3a. Name and address of target corporation:

Hipgnosis SFH I Limited  
27-28 Eastcastle Street, London, W1W 8DH, United Kingdom

3b. Employer identification number: 98-1806729

3c. Tax year ending: 03/31/2025 *[Note: For purposes of the Form 8023 and this attachment, the tax year ending listed for the Target Corporations is in each case the tax year end of such Target Corporation in its jurisdiction of incorporation.]*

3d. State or country of incorporation: United Kingdom

**Section C—Common Parent of Selling Consolidated Group, Selling Affiliate, S Corporation Shareholder, or U.S. Shareholder**

N/A

**5. Section D—General Information**

5a. Acquisition date: July 29, 2024

5b. What percentage of the target corporation stock was purchased:

(i) During the 12-month acquisition period? 100%

(ii) On the acquisition date? 100%

**Section E—General Information**

7. Check here to make a section 338 election (other than a section 338(h)(10) election) for the target corporation listed in Section B above   X  

9. Check here if this form is filed to make a section 338 election for any target corporation in addition to the one listed in Section B above   X  

\* \* \*

**Purchasing Corporation(s) Signature(s):**

Under penalties of perjury, I state and declare that I am authorized to make the election(s) on lines 6, 7, 8 and 9 on behalf of the purchasing corporation(s).



\_\_\_\_\_  
Signature of authorized person for purchasing corporation(s)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

**Attachment to Form 8023: Section E, Line 9 (3 of 9)**

**Section A-1—Purchasing Corporation**

1a. Name and address of purchasing corporation:

Lyra Bidco Limited  
40 Berkely Square, London, W1J 5AL, United Kingdom

1b. Employer identification number: [FOREIGN]

1c. Tax year ending: 04/30/2025 *[Note: For purposes of the Form 8023 and this attachment, the tax year ending listed for the Purchasing Corporation is in each case the tax year end of the Purchasing Corporation in its jurisdiction of incorporation.]*

1d. State or country of incorporation: United Kingdom

**Section A-2—Common Parent of Purchasing Corporation**

N/A

**Section B—Target Corporation**

3a. Name and address of target corporation:

Hipgnosis SFH XIII Limited  
27-28 Eastcastle Street, London, W1W 8DH, United Kingdom

3b. Employer identification number: 98-1806876

3c. Tax year ending: 03/31/2025 *[Note: For purposes of the Form 8023 and this attachment, the tax year ending listed for the Target Corporations is in each case the tax year end of such Target Corporation in its jurisdiction of incorporation.]*

3d. State or country of incorporation: United Kingdom

**Section C—Common Parent of Selling Consolidated Group, Selling Affiliate, S Corporation Shareholder, or U.S. Shareholder**

N/A

**5. Section D—General Information**

5a. Acquisition date: June 29, 2024

5b. What percentage of the target corporation stock was purchased:

(i) During the 12-month acquisition period? 100%

(ii) On the acquisition date? 100%

**Section E—General Information**

7. Check here to make a section 338 election (other than a section 338(h)(10) election) for the target corporation listed in Section B above   X  

9. Check here if this form is filed to make a section 338 election for any target corporation in addition to the one listed in Section B above   X  

\* \* \*

**Purchasing Corporation(s) Signature(s):**

Under penalties of perjury, I state and declare that I am authorized to make the election(s) on lines 6, 7, 8 and 9 on behalf of the purchasing corporation(s).

  
\_\_\_\_\_  
Signature of authorized person for purchasing corporation(s)      Date      Title

**Attachment to Form 8023: Section E, Line 9 (4 of 9)**

**Section A-1—Purchasing Corporation**

1a. Name and address of purchasing corporation:

Lyra Bidco Limited  
40 Berkely Square, London, W1J 5AL, United Kingdom

1b. Employer identification number: [FOREIGN]

1c. Tax year ending: 04/30/2025 *[Note: For purposes of the Form 8023 and this attachment, the tax year ending listed for the Purchasing Corporation is in each case the tax year end of the Purchasing Corporation in its jurisdiction of incorporation.]*

1d. State or country of incorporation: United Kingdom

**Section A-2—Common Parent of Purchasing Corporation**

N/A

**Section B—Target Corporation**

3a. Name and address of target corporation:

Hipgnosis SFH XIX Limited  
27-28 Eastcastle Street, London, W1W 8DH, United Kingdom

3b. Employer identification number: 98-1807157

3c. Tax year ending: 03/31/2025 *[Note: For purposes of the Form 8023 and this attachment, the tax year ending listed for the Target Corporations is in each case the tax year end of such Target Corporation in its jurisdiction of incorporation.]*

3d. State or country of incorporation: United Kingdom

**Section C—Common Parent of Selling Consolidated Group, Selling Affiliate, S Corporation Shareholder, or U.S. Shareholder**

N/A

**5. Section D—General Information**

5a. Acquisition date: June 29, 2024

5b. What percentage of the target corporation stock was purchased:

(i) During the 12-month acquisition period? 100%

(ii) On the acquisition date? 100%

**Section E—General Information**


7. Check here to make a section 338 election (other than a section 338(h)(10) election) for the target corporation listed in Section B above   X  

9. Check here if this form is filed to make a section 338 election for any target corporation in addition to the one listed in Section B above   X  

\* \* \*

**Purchasing Corporation(s) Signature(s):**

Under penalties of perjury, I state and declare that I am authorized to make the election(s) on lines 6, 7, 8 and 9 on behalf of the purchasing corporation(s).

  
\_\_\_\_\_  
Signature of authorized person for purchasing corporation(s)      Date      Title



**Attachment to Form 8023: Section E, Line 9 (5 of 9)**

**Section A-1—Purchasing Corporation**

1a. Name and address of purchasing corporation:

Lyra Bidco Limited  
40 Berkely Square, London, W1J 5AL, United Kingdom

1b. Employer identification number: [FOREIGN]

1c. Tax year ending: 04/30/2025 *[Note: For purposes of the Form 8023 and this attachment, the tax year ending listed for the Purchasing Corporation is in each case the tax year end of the Purchasing Corporation in its jurisdiction of incorporation.]*

1d. State or country of incorporation: United Kingdom

**Section A-2—Common Parent of Purchasing Corporation**

N/A

**Section B—Target Corporation**

3a. Name and address of target corporation:

Hipgnosis SFH XX Limited  
27-28 Eastcastle Street, London, W1W 8DH, United Kingdom

3b. Employer identification number: 98-1807413

3c. Tax year ending: 03/31/2025 *[Note: For purposes of the Form 8023 and this attachment, the tax year ending listed for the Target Corporations is in each case the tax year end of such Target Corporation in its jurisdiction of incorporation.]*

3d. State or country of incorporation: United Kingdom

**Section C—Common Parent of Selling Consolidated Group, Selling Affiliate, S Corporation Shareholder, or U.S. Shareholder**

N/A

**5. Section D—General Information**

5a. Acquisition date: July 29, 2024

5b. What percentage of the target corporation stock was purchased:

(i) During the 12-month acquisition period? 100%

(ii) On the acquisition date? 100%

**Section E—General Information**

7. Check here to make a section 338 election (other than a section 338(h)(10) election) for the target corporation listed in Section B above   X  

9. Check here if this form is filed to make a section 338 election for any target corporation in addition to the one listed in Section B above   X  

\* \* \*

**Purchasing Corporation(s) Signature(s):**

Under penalties of perjury, I state and declare that I am authorized to make the election(s) on lines 6, 7, 8 and 9 on behalf of the purchasing corporation(s).

  
\_\_\_\_\_  
Signature of authorized person for purchasing corporation(s)      Date      Title

**Attachment to Form 8023: Section E, Line 9 (6 of 9)**

**Section A-1—Purchasing Corporation**

1a. Name and address of purchasing corporation:

Lyra Bidco Limited  
40 Berkely Square, London, W1J 5AL, United Kingdom

1b. Employer identification number: [FOREIGN]

1c. Tax year ending: 04/30/2025 *[Note: For purposes of the Form 8023 and this attachment, the tax year ending listed for the Purchasing Corporation is in each case the tax year end of the Purchasing Corporation in its jurisdiction of incorporation.]*

1d. State or country of incorporation: United Kingdom

**Section A-2—Common Parent of Purchasing Corporation**

N/A

**Section B—Target Corporation**

3a. Name and address of target corporation:

PB Songs Limited  
27-28 Eastcastle Street, London, W1W 8DH, United Kingdom

3b. Employer identification number: 98-1807946

3c. Tax year ending: 03/31/2025 *[Note: For purposes of the Form 8023 and this attachment, the tax year ending listed for the Target Corporations is in each case the tax year end of such Target Corporation in its jurisdiction of incorporation.]*

3d. State or country of incorporation: United Kingdom

**Section C—Common Parent of Selling Consolidated Group, Selling Affiliate, S Corporation Shareholder, or U.S. Shareholder**

N/A

**5. Section D—General Information**

5a. Acquisition date: July 29, 2024

5b. What percentage of the target corporation stock was purchased:

(i) During the 12-month acquisition period? 100%

(ii) On the acquisition date? 100%

**Section E—General Information**

7. Check here to make a section 338 election (other than a section 338(h)(10) election) for the target corporation listed in Section B above   X  

9. Check here if this form is filed to make a section 338 election for any target corporation in addition to the one listed in Section B above   X  

\* \* \*

**Purchasing Corporation(s) Signature(s):**

Under penalties of perjury, I state and declare that I am authorized to make the election(s) on lines 6, 7, 8 and 9 on behalf of the purchasing corporation(s).

  
\_\_\_\_\_  
Signature of authorized person for purchasing corporation(s)      Date      Title

**Attachment to Form 8023: Section E, Line 9 (7 of 9)**

**Section A-1—Purchasing Corporation**

1a. Name and address of purchasing corporation:

Lyra Bidco Limited  
40 Berkely Square, London, W1J 5AL, United Kingdom

1b. Employer identification number: [FOREIGN]

1c. Tax year ending: 04/30/2025 *[Note: For purposes of the Form 8023 and this attachment, the tax year ending listed for the Purchasing Corporation is in each case the tax year end of the Purchasing Corporation in its jurisdiction of incorporation.]*

1d. State or country of incorporation: United Kingdom

**Section A-2—Common Parent of Purchasing Corporation**

N/A

**Section B—Target Corporation**

3a. Name and address of target corporation:

Deamon Limited  
27-28 Eastcastle Street, London, W1W 8DH, United Kingdom

3b. Employer identification number: 98-1806253

3c. Tax year ending: 03/31/2025 *[Note: For purposes of the Form 8023 and this attachment, the tax year ending listed for the Target Corporations is in each case the tax year end of such Target Corporation in its jurisdiction of incorporation.]*

3d. State or country of incorporation: United Kingdom

**Section C—Common Parent of Selling Consolidated Group, Selling Affiliate, S Corporation Shareholder, or U.S. Shareholder**

N/A

**5. Section D—General Information**

5a. Acquisition date: July 29, 2024

5b. What percentage of the target corporation stock was purchased:

(i) During the 12-month acquisition period? 100%

(ii) On the acquisition date? 100%

**Section E—General Information**

7. Check here to make a section 338 election (other than a section 338(h)(10) election) for the target corporation listed in Section B above   X  

9. Check here if this form is filed to make a section 338 election for any target corporation in addition to the one listed in Section B above   X  

\* \* \*

**Purchasing Corporation(s) Signature(s):**

Under penalties of perjury, I state and declare that I am authorized to make the election(s) on lines 6, 7, 8 and 9 on behalf of the purchasing corporation(s).

  
\_\_\_\_\_  
Signature of authorized person for purchasing corporation(s)      Date      Title

**Attachment to Form 8023: Section E, Line 9 (8 of 9)**

**Section A-1—Purchasing Corporation**

1a. Name and address of purchasing corporation:

Lyra Bidco Limited  
40 Berkely Square, London, W1J 5AL, United Kingdom

1b. Employer identification number: [FOREIGN]

1c. Tax year ending: 04/30/2025 *[Note: For purposes of the Form 8023 and this attachment, the tax year ending listed for the Purchasing Corporation is in each case the tax year end of the Purchasing Corporation in its jurisdiction of incorporation.]*

1d. State or country of incorporation: United Kingdom

**Section A-2—Common Parent of Purchasing Corporation**

N/A

**Section B—Target Corporation**

3a. Name and address of target corporation:

Kennedy Publishing and Productions Limited  
27-28 Eastcastle Street, London, W1W 8DH, United Kingdom

3b. Employer identification number: 98-1807691

3c. Tax year ending: 03/31/2025 *[Note: For purposes of the Form 8023 and this attachment, the tax year ending listed for the Target Corporations is in each case the tax year end of such Target Corporation in its jurisdiction of incorporation.]*

3d. State or country of incorporation: United Kingdom

**Section C—Common Parent of Selling Consolidated Group, Selling Affiliate, S Corporation Shareholder, or U.S. Shareholder**

N/A

**5. Section D—General Information**

5a. Acquisition date: July 29, 2024

5b. What percentage of the target corporation stock was purchased:

(i) During the 12-month acquisition period? 100%

(ii) On the acquisition date? 100%

**Section E—General Information**


7. Check here to make a section 338 election (other than a section 338(h)(10) election) for the target corporation listed in Section B above   X  

9. Check here if this form is filed to make a section 338 election for any target corporation in addition to the one listed in Section B above   X  

\* \* \*

**Purchasing Corporation(s) Signature(s):**

Under penalties of perjury, I state and declare that I am authorized to make the election(s) on lines 6, 7, 8 and 9 on behalf of the purchasing corporation(s).

  
\_\_\_\_\_  
Signature of authorized person for purchasing corporation(s)      Date \_\_\_\_\_      Title \_\_\_\_\_



**Attachment to Form 8023: Section E, Line 9 (9 of 9)**

**Section A-1—Purchasing Corporation**

1a. Name and address of purchasing corporation:

Lyra Bidco Limited  
40 Berkely Square, London, W1J 5AL, United Kingdom

1b. Employer identification number: [FOREIGN]

1c. Tax year ending: 04/30/2025 *[Note: For purposes of the Form 8023 and this attachment, the tax year ending listed for the Purchasing Corporation is in each case the tax year end of the Purchasing Corporation in its jurisdiction of incorporation.]*

1d. State or country of incorporation: United Kingdom

**Section A-2—Common Parent of Purchasing Corporation**

N/A

**Section B—Target Corporation**

3a. Name and address of target corporation:

RubyRuby (London) Limited  
27-28 Eastcastle Street, London, W1W 8DH, United Kingdom

3b. Employer identification number: 98-1808258

3c. Tax year ending: 03/31/2025 *[Note: For purposes of the Form 8023 and this attachment, the tax year ending listed for the Target Corporations is in each case the tax year end of such Target Corporation in its jurisdiction of incorporation.]*

3d. State or country of incorporation: United Kingdom

**Section C—Common Parent of Selling Consolidated Group, Selling Affiliate, S Corporation Shareholder, or U.S. Shareholder**

N/A

**5. Section D—General Information**

5a. Acquisition date: July 29, 2024

5b. What percentage of the target corporation stock was purchased:

(i) During the 12-month acquisition period? 100%

(ii) On the acquisition date? 100%

**Section E—General Information**

7. Check here to make a section 338 election (other than a section 338(h)(10) election) for the target corporation listed in Section B above   X  

9. Check here if this form is filed to make a section 338 election for any target corporation in addition to the one listed in Section B above   X  

\* \* \*

**Purchasing Corporation(s) Signature(s):**

Under penalties of perjury, I state and declare that I am authorized to make the election(s) on lines 6, 7, 8 and 9 on behalf of the purchasing corporation(s).

  
\_\_\_\_\_  
Signature of authorized person for purchasing corporation(s)      Date      Title