

August 7, 2024

Attention: U.S. Shareholders of Murano Global Investments PLC (FKA: HCM Acquisition Corp)

## **IMPORTANT TAX NOTICE**

Re: 2023 PFIC Status

**This statement is provided for shareholders who are United States persons for purposes of the U.S. Internal Revenue Code. It is not relevant to other shareholders.**

Murano Global Investments PLC (FKA: HCM Acquisition Corp) (or “the Company”) meets the Internal Revenue Code definition of a passive foreign investment company (“PFIC”) for the taxable year ended December 31, 2023. The Company is hereby making available PFIC Annual Information Statements for Murano Global Investments PLC (FKA: HCM Acquisition Corp) for their taxable year beginning on January 1, 2023 and ending on December 31, 2023 pursuant to the requirements of Treasury Regulation Section 1.1295-1(g)(1).

The PFIC Annual Information Statements contain information to enable you, should you choose, to elect to treat Murano Global Investments PLC (FKA: HCM Acquisition Corp) as a Qualified Electing Fund (“QEF”).

A U.S. shareholder who makes a QEF election for Murano Global Investments PLC (FKA: HCM Acquisition Corp) is required annually to include in his or her income or his or her pro rata share of the ordinary earnings and net capital gains for Murano Global Investments PLC (FKA: HCM Acquisition Corp). The QEF election is made by completing and attaching Form 8621 for each PFIC to your federal income tax return filed by the due date of the return, including extensions.

U.S. shareholders are advised to consult with their tax advisors with respect to the 2023 PFIC Annual Information Statement.

Further information on PFIC rules is available on the internet at the Internal Revenue Service website, including the following pages:

Detailed information about PFICs and the QEF election: <https://www.irs.gov/instructions/i8621>  
Instructions to complete Form 8621: <https://www.irs.gov/pub/irs-pdf/i8621.pdf>  
Form 8621: <https://www.irs.gov/pub/irs-pdf/f8621.pdf>

**THIS INFORMATION IS PROVIDED IN ORDER TO ASSIST SHAREHOLDERS IN MAKING CALCULATIONS AND DOES NOT CONSTITUTE TAX ADVICE. SHAREHOLDERS ARE ADVISED TO CONSULT THEIR OWN TAX ADVISORS CONCERNING THE OVERALL TAX CONSEQUENCES OF THE OWNERSHIP OF MURANO GLOBAL INVESTMENTS PLC FKA( HCM ACQUISITION CORP.) ARISING IN THEIR OWN PARTICULAR SITUATIONS UNDER THE UNITED STATES FEDERAL, STATE, LOCAL OR FOREIGN LAW.**

## PFIC Annual Information Statement

### Murano Global Investments PLC (FKA: HCM Acquisition Corp)

- 1) This Information Statement applies to the taxable year of Murano Global Investments PLC (FKA: HCM Acquisition Corp) beginning on January 1, 2023 and ending on December 31, 2023 (the “Taxable Year”).
- 2) Your pro rata share of Murano Global Investments PLC (FKA: HCM Acquisition Corp)’s ordinary earnings for the Taxable Year can be determined as follows:
  - i) If you owned Murano Global Investments PLC (FKA: HCM Acquisition Corp)’s shares for the entire period from January 01, 2023 through December 31, 2023, you should multiply the number of shares by the “Ordinary Income Per Share” amount below.

	Total Ordinary Income	Ordinary Income Per Share
Class B Ordinary Shares	US\$ 0.00	US\$ 0.000000
Class A Ordinary Shares	US\$ 5,553,509	US\$ 1.002895

- ii) If you did not own all of your Murano Global Investments PLC (FKA: HCM Acquisition Corp)’s shares for the entire 365 day period, your daily pro rata share of Murano Global Investments PLC (FKA: HCM Acquisition Corp)’s ordinary earnings is:

	Daily Ordinary Income Pro Rata Share
Class B Ordinary Shares (January 01, 2023 – December 31, 2023)	US\$ 0.000000
Class A Ordinary Shares (January 01, 2023 – December 31, 2023)	US\$ 0.004259

- iii) If you owned shares for the period from January 1, 2023 through April 22, 2023, you should multiply the number of shares by the “Ordinary Income Per Share” amount below.

	Total Ordinary Income	Ordinary Income Per Share
Class B Ordinary Shares	US\$ 0.00	US\$ 0.000000
Class A Ordinary Shares	US\$ 1,704,090	US\$ 0.059273

- iv) If you did not own all of your shares for the 112 day period between January 1, 2023 through April 22, 2023, your daily pro rata share of 's ordinary earnings is:

	Daily Ordinary Income Pro Rata Share
Class B Ordinary Shares (January 01, 2023 – April 22, 2023)	US\$ 0.000000
Class A Ordinary Shares (January 01, 2023 – April 22, 2023)	US\$ 0.000529

- v) If you owned 's shares for the period from April 22, 2023 through December 31, 2023, you should multiply the number of shares by the "Ordinary Income Per Share" amount below.

	Total Ordinary Income	Ordinary Income Per Share
Class B Ordinary Shares	US\$ 0.00	US\$ 0.000000
Class A Ordinary Shares	US\$ 3,849,419	US\$ 0.943622

- vi) If you did not own all of your shares for the 253 day period from April 22, 2023 through December 31, 2023, your daily pro rata share of's ordinary earnings is:

	Daily Ordinary Income Pro Rata Share
Class B Ordinary Shares (April 22, 2023 – December 31, 2023)	US\$ 0.000000
Class A Ordinary Shares (April 22, 2023 – December 31, 2023)	US\$ 0.003730

U.S. shareholders are advised to consult with their tax advisors with respect to the calculation of their pro rata share of Murano Global Investments PLC (FKA: HCM Acquisition Corp)'s ordinary earnings and net short term and long-term capital gain for the Taxable Year.

- 3) The amount of cash and the fair market value of other property distributed or deemed distributed by Murano Global Investments PLC (FKA: HCM Acquisition Corp)'s during the Taxable Year are as follows:

Cash: US \$0.00  
Fair Market Value of Property: US \$0.00

- 4) The Summary of Annual Information of Murano Global Investments PLC (FKA: HCM Acquisition Corp)'s is as follows:

a) Description of each class of shares – **Class A and B Ordinary Share.**

b) Total number of shares outstanding at year-end:

i) Class B Ordinary Shares at April 22, 2023: **10,062,500** and

ii) Class A Ordinary Shares at April 22, 2023: **28,750,000**

iii) Class B Ordinary Shares at December 31, 2023: **75,000**

iv) Class A Ordinary Shares at December 31, 2023: **14,066,906\***

**9,987,500** Class A Ordinary shares are restricted in that they waive any right, title, interest of any kind to the Trust Account or any monies or other assets held therein.

c) Total FMV of Class A Ordinary shares at April 22, 2023 – **US\$ 10.50 per share.**

d) Total FMV of Class A Ordinary shares at December 31, 2023 – **US\$ 11.18 per share.**

- 5) Any shareholders making a QEF election will be permitted by Murano Global Investments PLC (FKA: HCM Acquisition Corp) to inspect and copy its permanent books of account, records, and such other documents as are maintained by Murano Global Investments PLC (FKA: HCM Acquisition Corp) that are necessary to establish that Murano Global Investments PLC (FKA: HCM Acquisition Corp)'s ordinary earnings and net capital gain, as provided in section 1293(e) of the U.S. Internal Revenue Code, are computed in accordance with U.S. income tax principles, and to verify these amounts and your pro rata share thereof.

\*On April 22, 2023, following the extraordinary general meeting, shareholders holding all of the issued and outstanding Class B ordinary shares elected to convert their Class B ordinary shares into Class A ordinary shares on a one-for-one basis (the "Sponsor Share Conversion"). As a result, 9,987,500 of our Class B ordinary shares were cancelled and 9,987,500 of our Class A ordinary shares were issued to such converting Class B shareholders. The converting Class B shareholders agreed that all of the terms and conditions applicable to the Class B ordinary shares shall continue to apply to the Class A ordinary shares that the Class B ordinary shares converted into, including the voting agreement, transfer restrictions and waiver of any right, title, interest or claim of any kind to the Trust Account or any monies or other assets held therein. Following the Sponsor Share Conversion, and the redemptions mentioned above, we had approximately 14,066,906 Class A ordinary shares issued and outstanding and no Class B ordinary shares issued and outstanding.

Murano Global Investments PLC (FKA: HCM Acquisition Corp)

Date: August 14th, 2024

By:   
Authorized Representative