

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name		2 Issuer's employer identification number (EIN)	
Parkland Corporation		Foreign	
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact	
Scott Grischow	(214) 840-5560	IR@SunocoLP.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact		7 City, town, or post office, state, and ZIP code of contact	
8111 Westchester Drive, Suite 400		Dallas, Texas 75225	
8 Date of action		9 Classification and description	
October 31, 2025		Common Stock	
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)
70137W108	N/A	PKI (TSX Listed)	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 ▶ On May 4, 2025, Parkland Corporation, an Alberta corporation ("Parkland"), entered into an Arrangement Agreement (the "Arrangement Agreement") and a related Plan of Arrangement with Sunoco LP, a Delaware limited partnership ("Sunoco"), and SunocoCorp LLC ("SunocoCorp"), formerly Nustar GP Holdings, LLC, a Delaware limited liability company and wholly owned subsidiary of Sunoco. The agreement was effectuated as follows: Sunoco Retail LLC, a wholly owned subsidiary of Sunoco that is taxed as a corporation, acquired all of issued and outstanding common shares of Parkland (the "Parkland Shares"), resulting in Parkland becoming a wholly owned subsidiary of Sunoco. Upon consummation of the Arrangement, SunocoCorp will become a publicly traded company, elected to be taxed as a corporation, that holds limited partnership interests in Sunoco (the "Sunoco Class D Units"), which are economically equivalent to Sunoco's publicly traded common units, on the basis of one Sunoco Class D Unit for each outstanding SunocoCorp common share. Pursuant to the Arrangement, Parkland's common shareholders received, for each share owned at the time of the Arrangement, either 0.536 SunocoCorp common shares, each representing a limited liability interest in SunocoCorp; if electing a mix of cash and units, CAD \$19.80 in cash and 0.295 SunocoCorp common shares; or, if electing cash, CAD \$21.82 in cash and approximately 0.270 SunocoCorp common shares.

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 ▶ Parkland shareholders are deemed to exchange their Parkland common shares for SunocoCorp common shares in a taxable transaction. To the extent a Parkland shareholder elects to receive cash in exchange for its Parkland common shares pursuant to the Arrangement, such shareholder will be treated as having sold a portion of its Parkland common shares for cash.

All Parkland shareholders are urged to consult their own tax advisors for a full understanding of the U.S. federal, state, local and non-U.S. tax consequences of the Arrangement to them.

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 ▶ The tax basis of the SunocoCorp common shares received equals the fair market value of the SunocoCorp common shares received by each former Parkland shareholder at closing, which is approximately \$52.22 per share. This amount is based on the closing price of Sunoco stock on October 31, 2025, the date of the Parkland acquisition, and was used as a proxy for fair market value since SunocoCorp stock was not publicly traded prior to the transaction.

All Parkland shareholders are urged to consult their own tax advisors for a full understanding of the U.S. federal, state, local and non-U.S. tax consequences of the Arrangement to them.

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ 338, 1001

18 Can any resulting loss be recognized? ▶ Parkland shareholders are expected to recognize gain or loss equal to the amount realized (fair market value of SunocoCorp common shares received plus any cash consideration) less their adjusted basis in the Parkland common shares surrendered.

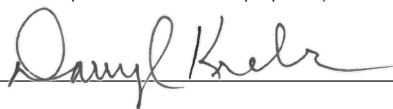
All Parkland shareholders are urged to consult their own tax advisors for a full understanding of the U.S. federal, state, local and non-U.S. tax consequences of the Arrangement to them.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ Any adjustments would generally be reportable in the tax year ended December 31, 2025 (in the case of a common shareholder utilizing a calendar year end).

However, shareholders are advised to consult their own tax advisor regarding the proper reportable tax year.

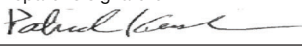
Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here

Signature ▶  Date ▶ 12/05/2025

Print your name ▶ Darryl Krebs Title ▶ Vice President - Tax

Paid Preparer Use Only

Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
<u>Patrick Kessler</u>	<u></u>	<u>12/15/2025</u>		<u>P01345182</u>
Firm's name ▶ <u>KPMG LLP</u>	Firm's EIN ▶ <u>13-5565207</u>		Phone no. <u>(713) 319-2000</u>	
Firm's address ▶ <u>811 Main Street, Suite 4500, Houston, TX 77002</u>				

Summary of Tax Consequences

The following tax consequences are associated with the acquisition of Parkland Corporation by SunocoCorp LLC is contingent upon the transaction qualifying as a Qualified Stock Purchase (“QSP”) pursuant to Section 338(d)(3) of the U.S. Internal Revenue Code of 1986 and Treasury Regulations promulgated thereunder (the “Code”).

1. Introduction

On May 4, 2025, Parkland Corporation, an Alberta corporation (“Parkland”), entered into an Arrangement Agreement (the “Arrangement Agreement”) and a related Plan of Arrangement with Sunoco LP, a Delaware limited partnership (“Sunoco”), and SunocoCorp LLC (“SunocoCorp”), formerly Nustar GP Holdings, LLC, a Delaware limited liability company and wholly owned subsidiary of Sunoco. The agreement was effectuated as follows: Sunoco Retail LLC, a wholly owned subsidiary of Sunoco that is taxed as a corporation, acquired all of the issued and outstanding common shares of Parkland (the “Parkland Shares”), resulting in Parkland becoming a wholly owned subsidiary of Sunoco. Upon consummation of the Arrangement, SunocoCorp will become a publicly traded company, elected to be taxed as a corporation, that holds limited partnership interests in Sunoco (the “Sunoco Class D Units”), which are economically equivalent to Sunoco’s publicly traded common units, on the basis of one Sunoco Class D Unit for each outstanding SunocoCorp common share.

Pursuant to the Arrangement, after taking into account the elections made by Parkland shareholders and the proration, maximum amounts and adjustments set forth in the Plan of Arrangement, Parkland’s common shareholders received, for each share owned at the time of the Arrangement, either 0.536 SunocoCorp common shares, each representing a limited liability interest in SunocoCorp; if electing a mix of cash and shares, CAD \$19.80 in cash and 0.295 SunocoCorp common shares; or, if electing cash, CAD \$21.82 in cash and approximately 0.270 SunocoCorp common shares.

This document is intended to provide a summary of certain U.S. federal income tax consequences to persons who exchanged Parkland Shares for SunocoCorp shares pursuant to the Plan of Arrangement. This document does not constitute tax advice and does not address any special tax rules (including, but not limited to, the alternative minimum tax) or the tax consequences in any state, local, or foreign jurisdiction.

The actual tax consequences of the Arrangement to you may be complex and will depend on your specific tax situation. Please consult your own tax adviser to determine the U.S. income tax consequences of the transaction to you considering your own personal circumstances as well as any other tax consequences under any state, local, or foreign tax authorities.

For purposes of the following discussion, each Parkland shareholder is an individual citizen or resident of the United States who purchased Parkland Shares for cash and held such shares as a capital asset. This document does not generally apply to any shares held in tax-deferred accounts, such as 401(k) or IRA accounts, nor does it address the consequences to foreign shareholders. Further, the following summary is premised on the Arrangement qualifying as a QSP under the Code.

II. Summary of Certain U.S. Federal Income Tax Consequences

A. Gain/Loss

The tax basis of the SunocoCorp common shares received equals the fair market value of the SunocoCorp common shares received by each former Parkland shareholder at closing, which is approximately \$52.22 per share. This amount is based on the closing price of Sunoco stock on October 31, 2025, the date of the Parkland acquisition, and was used as a proxy for fair market value since SunocoCorp stock was not publicly traded prior to the transaction.

Parkland shareholders are expected to recognize gain or loss equal to the amount realized (fair market value of SunocoCorp common shares received plus any cash consideration) less their adjusted basis in the Parkland Shares surrendered.

B. Holding Period

The holding period for SunocoCorp common shares received in exchange for Parkland Shares pursuant to the Arrangement begins the day after the transaction close (e.g., November 1, 2025).

SunocoCorp does not provide tax advice to its shareholders and suggests that you consult a tax advisor with any questions.