PRO FORMA SCHEDULE K-1 & K-3 LINE ITEMS FOR 2024 YEAR, PER UNIT PLEASE REFER TO "US UNITHOLDER TAX INFORMATION" FOR MORE INFORMATION

L51123OMB No. 1545-0123

				Final K	-1	Amended	K-1	OMB No. 1545-0123
	edule K-1	2024	Pa	art III 🛮	Partne	r's Share of	Cur	rent Year Income,
(For	m 1065)				Deduct	tions, Credi	ts, a	nd Other Items
	rtment of the Treasury al Revenue Service F	or calendar year 2024, or tax year	1	Ordinary	/ business i	ncome (loss)	14	Self-employment earnings (loss)
D	9 9	ending / /	2	Net rent	al real esta	te income (loss)		
	tner's Share of Income, De dits, etc.	See separate instructions.	3	Other no	et rental inc	come (loss)	15	Credits
■ P	art I Information About the I	Partnership	4a	Guarant	teed payme	ents for services		
Α	Partnership's employer identification numbe		1					
İ	98-6068269		4b	Guarant	teed payme	ents for capital	16	Schedule K-3 is attached if
В	Partnership's name, address, city, state, and	ZIP code						checked x
1	ANITE REAL ESTATE INVESTN KING STREET WEST, SUITE 40		4c	Total gu	ıaranteed p	payments	17	Alternative minimum tax (AMT) items
TOI	RONTO, ONTARIO, CANADA, N	15K1H1	5	Interest	income			
С	IRS center where partnership filed return:					2.64422		
D	Check if this is a publicly traded partner		6a	Ordinar	y dividends	;		
P	art II Information About the I	Partner				1.42138		
E	Partner's SSN or TIN (Do not use TIN of a dis	sregarded entity. See instructions.)	6b	Qualifie	d dividends	3	18	Tax-exempt income and nondeductible expenses
<u> </u>	PRO FORM	A				0.98695		nondeductible expenses
F	Name, address, city, state, and ZIP code for p	artner entered in E. See instructions.	6c	Dividen	d equivalen	its		
			7	Royaltie	es			
G	General partner or LLC	imited partner or other LLC	8	Net sho	rt-term cap	oital gain (loss)		
	member-manager r	nember					19	Distributions
H1	☐ Domestic partner ☐ F	oreign partner	9a	Net long	g-term capi	tal gain (loss)	Α	2.41373
H2	If the partner is a disregarded entity (DE	, enter the partner's:						
	TIN Name		9b	Collecti	bles (28%)	gain (loss)		
11	What type of entity is this partner?						20	Other information
12	If this partner is a retirement plan (IRA/SEP/k	eogh/etc.), check here .	9c	Unrecap	otured sect	ion 1250 gain		
J	Partner's share of profit, loss, and capital (se	,					Α	4.45884
	Beginning	Ending	10	Net sec	tion 1231 g		_	
	Profit %	%	44	011		(0.00256)	В	0.37599
	Loss %	%	11	Otner in	icome (loss	•	_	0.0500/
	Capital %	%				0.39325	Z	0.05996
	Check if decrease is due to:							SEE FOOTNOTE
	Sale or Exchange of partnership in	iterest. See instructions.	12	Section	179 deduc	tion	21	Foreign taxes paid or accrued
K1	Partner's share of liabilities: Beginning	Ending	'-	Coolion	170 00000	Alon		Toroigit taxoo para or abordoa
	Nonrecourse \$	\$	13	Other de	eductions			
		Ψ	Ιн			0.98836		
	Qualified nonrecourse financing \$	\$						
	Recourse \$	\$	AE			0.37599		
K2	Check this box if item K1 includes liability amou	nts from lower-tier partnerships						
кз	Check if any of the above liability is sub	ject to guarantees or other						
	payment obligations by the partner. See inst	ructions	22	Mor	e than one	activity for at-risk	purpo	oses*
L	Partner's Capital Acco	unt Analysis	23	Mor	e than one	activity for passiv	e activ	vity purposes*
	Beginning capital account \$_		*S	ee attac	hed stat	ement for add	dition	al information.
	Capital contributed during the year \$_			*FOOT	NOTE*			
	Current year net income (loss) \$_			THE F	OLLOWII	NG AMOUNT	INC	LUDED IN ORDINARY
	Other increase (decrease) (attach explanation) \$_		Use Only					TES FROM GRANITE
	Withdrawals and distributions \$_)	0					BE TREATED AS A
	Ending capital account \$		ŢŠ	QUALI	FIED RE	IT DIVIDEND		
м	Did the partner contribute property with a bu	ilt-in gain (loss)?	SS.	DIEAG	E CONS	SULT YOUR T	· \ \ \ '	NDVISOR
<u> </u>	Yes No If "Yes," attach stat		For IRS	LEAS	L CONS	OLI TOUR I	$\neg \wedge F$	AD VIOUN
N	Partner's Share of Net Unrecognized \$		"	BOX 20	0z: 0.059	96		
	Beginning							
1	Ending \$		1					

Partner's Share of Income, Deductions, Credits, etc.—International

OMB No. 1545-0123

2024

Department of the Treasury Internal Revenue Service For calendar year 2024, or tax year beginning / / 2024 , ending / / See separate instructions.

		information About the Partnership					_ !	ntc	orn	ıat	ıor	ı A	po	ut 1	ine	Pa	irtn	er				
A F	artner	ship's employer identification number (EIN)	C							,			,	,	r tax See i	. ,			cati	on num	ber (TII	N)
		98-6068269										Ρŀ	RO	FC)RI	ЛΑ						
В	artner	ship's name, address, city, state, and ZIP code	D	N	ame	e, ac	dre	ss, c	ity,	state	, an	d ZI	Рсо	de fo	or pa	rtner	ente	ered	in bo	ox C. S	ee instru	uctions
77	KIN(RON	TE REAL ESTATE INVESTMENT TRUST G STREET WEST, SUITE 4010 TO, ONTARIO, CANADA, M5K 1H1																				
Е	Chec	k to indicate the parts of Schedule K-3 that apply.																			Yes	No
	1	Does Part I apply? If "Yes," complete and attach Part I																		1		✓
	2	Does Part II apply? If "Yes," complete and attach Part II .																		2	✓	
	3	Does Part III apply? If "Yes," complete and attach Part III .																		3	✓	
	4	Does Part IV apply? If "Yes," complete and attach Part IV .																		4	✓	
	5	Does Part V apply? If "Yes," complete and attach Part V .																		5		✓
	6	Does Part VI apply? If "Yes," complete and attach Part VI.																		6		✓
	7	Does Part VII apply? If "Yes," complete and attach Part VII																		7		✓
	8	Does Part VIII apply? If "Yes," complete and attach Part VIII																		8		✓
	9	Does Part IX apply? If "Yes," complete and attach Part IX .																		9	✓	
	10	Does Part X apply? If "Yes," complete and attach Part X .																		10	✓	
	11	Does Part XI apply? If "Yes," complete and attach Part XI.																		11		✓
	12	Does Part XII apply? If "Yes," complete and attach Part XII																		12		✓
	13	Does Part XIII apply? If "Yes," complete and attach Part XIII																		13		✓

Schedule K-3 (Form 1065) 2024							Page 2
Name of partnership	E	EIN	Name of part	tner		SSN or TIN	
GRANITE REAL ESTATE INVESTME	ENT TRUST	98-6068269	PRO FOR	RMA PER UNIT			
Part I Partner's Share of Pa	rtnership's Other	r Current Year In	ternational Inforn	nation		•	
Check box(es) for additional specified attachm	nents. See instructions.						
1. Gain on personal property sale	5. High-taxed			471 information	□ 11. □	Oual consolidated loss	
2. Foreign oil and gas taxes	6. Section 26	7A disallowed deducti	on 9. Other fo	orms	☐ 12. F	orm 8865 information	
3. Splitter arrangements	7. Reserved f	or future use	10. Partner	loan transactions		Other international items	
4. Foreign tax translation					(a	attach description and sta	itement)
Part II Foreign Tax Credit Li Section 1—Gross Income	mitation						
Section 1—Gross income			Foreign	Source			
Description	(a) U.S. source	(b) Foreign branch	(c) Passive	(d) General	(e) Other	(f) Sourced by	(g) Total
2000.	(4, 5151 5531 55	category income	category income	category income	(category code	partner	(3)
1 Sales						_	
A							
В							
С							
2 Gross income from performance of services							
A							
В							
С							
3 Gross rental real estate income							
A							
В							
C 4 Other gross rental income							
AB							
c							
5 Guaranteed payments							
6 Interest income							
A US	1.51620						1.51620
вСА			0.35971				0.35971
c GM			0.22804				0.22804
7 Ordinary dividends (exclude amount							
on line 8)							
A US	0.05996						0.05996
B CA			0.37447				0.37447
c GM							

Sched	lule K-3 (Form 1065) 2024							Page 2
lame	of partnership	1	EIN	Name of par	tner		SSN or TIN	
GRA	ANITE REAL ESTATE INVESTME	ENT TRUST	98-6068269	PRO FOR	RMA PER UNIT			
	art I Partner's Share of Pa		r Current Year In	ternational Inforn	nation		•	
Chec	k box(es) for additional specified attachm	ents. See instructions						
	1. Gain on personal property sale	5. High-taxed	d income	8. Form 5	471 information	☐ 11. Dı	ual consolidated loss	
	2. Foreign oil and gas taxes	6. Section 26	7A disallowed deduction	on 9. Other f	orms	☐ 12. Fo	orm 8865 information	
	3. Splitter arrangements	7. Reserved t	for future use	10. Partner	loan transactions	☐ 13. Of	ther international items	
	4. Foreign tax translation					(at	tach description and sta	atement)
	-							
Pa	art II Foreign Tax Credit Li	mitation						
Sec	ction 1—Gross Income							
				Foreign	Source		(f) Sourced by	
	Description	(a) U.S. source	(b) Foreign branch category income	(c) Passive category income	(d) General category income	(e) Other (category code	partner	(g) Total
1	Sales							
Α								
В								
С								
2	Gross income from performance of services							
Α								
В								
С								
3	Gross rental real estate income							
Α								
В								
<u>C</u>								
	Other gross rental income							
A								
B C								
	Guaranteed payments							
	Interest income							
	AU			0.31613				0.31613
	NL			0.22415				0.22415
С	-							
	Ordinary dividends (exclude amount on line 8)							
	AU							
В	NL							

С

Name of partnership	EIN	Name of partner	SSN or TIN
GRANITE REAL ESTATE INVESTMENT TRUST	98-6068269	PRO FORMA PER UNIT	

Part II Foreign Tax Credit Limitation (continued)

Section 1—Gross Income (contin	nuea)	1					
			Foreign	Source		(f) Sourced by	
Description	(a) U.S. source	(b) Foreign branch category income	(c) Passive category income	(d) General category income	(e) Other (category code	partner	(g) Total
8 Qualified dividends							
a US							
в CA			0.98695				0.98695
c GM							
9 Reserved for future use							
10 Royalties and license fees							
A							
В							
С							
11 Net short-term capital gain							
A							
В							
C							
12 Net long-term capital gain							
A							
В							
C							
13 Collectibles (28%) gain							
A							
В							
C							
14 Unrecaptured section 1250 gain							
A							
В							
C							
15 Net section 1231 gain							
A							
В							
С							

Name of partnership	EIN	Name of partner	SSN or TIN
GRANITE REAL ESTATE INVESTMENT TRUST	98-6068269	PRO FORMA PER UNIT	

Part II Foreign Tax Credit Limitation (continued)

Section 1—Gross Income (conti	nuea)	1					
			Foreigr	Source		(f) Sourced by	
Description	(a) U.S. source	(b) Foreign branch category income	(c) Passive category income	(d) General category income	(e) Other (category code	partner	(g) Total
8 Qualified dividends							
A AU							
в NL							
С							
9 Reserved for future use							
10 Royalties and license fees							
A							
В							
С							
11 Net short-term capital gain							
Α							
В							
C							
12 Net long-term capital gain							
Α							
В							
C							
13 Collectibles (28%) gain							
Α							
В							
c							
14 Unrecaptured section 1250 gain							
Α							
В							
15 Net section 1231 gain							
A							
В							
C							

Schedule K-3 (Form 1065) 2024 Page **4**

Name of partnership	EIN	Name of partner	SSN or TIN
GRANITE REAL ESTATE INVESTMENT TRUST	98-6068269	PRO FORMA PER UNIT	

Part II Foreign Tax Credit Limitation (continued)

Section 1—Gross Income (continued) Foreign Source (f) Sourced by Description (a) U.S. source (b) Foreign branch (g) Total (c) Passive (d) General (e) Other partner category income category income category income (category code **16** Section 986(c) gain . _ **17** Section 987 gain 0.01227 0.01227 **18** Section 988 gain Reserved for future use Α В С 20 Other income (see instructions) **A** US 0.15018 0.15018 в СА 0.19694 0.19694 c GM 21 Reserved for future use Α В С 22 Reserved for future use Α В С 23 Reserved for future use Α В С Total gross income (combine lines 1 1.72634 0.01227 4.48078 through 23) 2.74217 1.72634 1.72634 A US в СА 1.91807 1.91807 c GM 0.22804 0.22804

Name of partnership	EIN	Name of partner	SSN or TIN
GRANITE REAL ESTATE INVESTMENT TRUST	98-6068269	PRO FORMA PER UNIT	

Part II Foreign Tax Credit Limitation (continued)

			Foreign	Source		(f) Coursed by	
Description	(a) U.S. source	(b) Foreign branch category income	(c) Passive category income	(d) General category income	(e) Other (category code	(f) Sourced by partner	(g) Total
16 Section 986(c) gain							
17 Section 987 gain							
18 Section 988 gain							
19 Reserved for future use							
Α							
В							
С							
20 Other income (see instructions)							
A AU							
в NL			0.05578				0.0557
С							
21 Reserved for future use							
A							
В							
С							
22 Reserved for future use							
A							
В							
С							
23 Reserved for future use							
Α							
В							
С							
24 Total gross income (combine lines 1							
through 23)							
A AU			0.31613				0.31613
в NL			0.27993				0.27993
С							

Name of partnership

GRANITE REAL ESTATE INVESTMENT TRUST

98-6068269

PRO FORMA PER UNIT

SSN or TIN

Part II Foreign Tax Credit Limitation (continued)

Section 2—Deductions

	ction 2—Deductions			Foreigr	Source			
	Description	(a) U.S. source	(b) Foreign branch category income	(c) Passive category income	(d) General category income	(e) Other (category code	(f) Sourced by partner	(g) Total
25	Expenses allocable to sales income .							
26	Expenses allocable to gross income from performance of services							
27	Net short-term capital loss							
28	Net long-term capital loss							
29	Collectibles loss							
30	Net section 1231 loss						0.00256	0.00256
31	Other losses							
32	Research & experimental (R&E) expenses							
Α								
В	SIC code:							
С	SIC code:							
33	Allocable rental expenses – depreciation, depletion, and amortization							
34	Allocable rental expenses—other than depreciation, depletion, and amortization							
35	Allocable royalty and licensing expenses—depreciation, depletion, and amortization							
36	Allocable royalty and licensing expenses—other than depreciation, depletion, and amortization							
37	Depreciation not included on line 33 or line 35							
38	Charitable contributions							
39	Interest expense specifically allocable under Regulations section 1.861-10(e)							
40	Other interest expense specifically allocable under Regulations section 1.861-10T							
41	Other interest expense—business .							
42	Other interest expense—investment .						0.98836	0.98836
43	Other interest expense—passive activity							
44	Section 59(e)(2) expenditures, excluding R&E expenses on line 32							
45	Foreign taxes not creditable but deductible							

													- 0
	dule K-3 (Form 1065) 2024 of partnership			EIN		Na	me of part	ner				SSN or TIN	Page 6
	ANITE REAL ESTATE	INIVECTME	INT TOUCT		-6068269			RMA PER UI	\IIT			CONT OF THE	
_			mitation (cont		-0000209	9 P F	COFOR	RIVIA PER UI	VIII				
	ction 2—Deductions			nueu)									
36	ction 2—Deductions	(COITIIIIU C U)					Foreign	Source					
	Description		(a) U.S. source	()	n branch income	(c) Pass	sive	(d) General category inc		(e) Other (category code	(f)	Sourced by partner	(g) Total
46	Section 986(c) loss												
	Section 987 loss												
48	Section 988 loss											0.02192	0.02192
49	Other allocable deductions instructions)	s (see				0	.37599						0.37599
50	Other apportioned share or deductions (see instruction												
51	Reserved for future use .												
52	Reserved for future use .												
53	Reserved for future use .												
54	Total deductions (combin through 53)					0	.37599					1.01284	1.38883
55	Net income (loss) (subtraction line 24)												
Pa	art III Other Infor	mation for	Preparation of	of Form 111	6 or 111	8							_
Se	ction 1-R&E Expens	es Apporti	onment Facto	rs									
						Foreigr	Source						
	Description	(a) U.S. s	()	oreign branch gory income	1	Passive ory income	1	l) General gory income	1	(e) Other gory code)		urced by artner	(g) Total
									(cour	ntry code)			
1.	Gross receipts by SIC code												
	SIC code:								+				
В									+				
C									-				
D	0.0 0000.								1				
E F									+				
<u>_</u>	Exclusive apportionment	with respect	to total D°E avec	sees entered as	Dort II line	22							
2 A	• •	•			i rait II, III le	. J2.							
	TIGE CAPCITICS WITH TESP	cor to activity	por formed in the C	mica olaios									

D	SIC code:						
Ε	SIC code:						
F	SIC code:						
2	Exclusive apportionmen	nt with respect to total R	R&E expenses entered on	Part II, line 32.			
Α	R&E expenses with resp	pect to activity performe	ed in the United States				
	(i) SIC code:				 	2A(i)	
	(ii) SIC code:				 	2A(ii)	
	(iii) SIC code:				 	2A(iii)	
В	R&E expenses with resp	pect to activity performe	ed outside the United Stat	es			
	(i) SIC code:				 	2B(i)	
	(ii) SIC code:				 	2B(ii)	
	(iii) SIC code:				 	2B(iii)	

Sche	dule K-3 (Form 1065) 2024											Page
lame	e of partnership	I	EIN		Na	me of part	tner				SSN or TIN	
GR	ANITE REAL ESTATE INVESTMENT T	RUST	98-6	6068269	PR	O FOR	RMA PER UNI	ΙT				
	art III Other Information for Prepa	ration of F	orm 1116	or 111	8 (continued	d)						
Se	ction 2—Interest Expense Apportionn	nent Facto	rs									
						Foreign	Source					
	Description (a) U	J.S. source	(b) Foreign category i		(c) Pass category in		(d) General category incor	me (((e) Other category code country code		urced by artner	(g) Total
1	Total average value of assets				72.	81300						72.8130
2	Sections 734(b) and 743(b) adjustment to assets—average value.											
3	Assets attracting directly allocable interest expense under Regulations section 1.861-10(e)											
4	Other assets attracting directly allocable interest expense under Regulations section 1.861-10T											
5	Assets excluded from apportionment formula											
6a	Total assets used for apportionment (subtract the sum of lines 3, 4, and 5 from the sum of lines 1 and 2)				72.	81300						72.8130
b	Assets attracting business interest expense											
С	Assets attracting investment interest expense				72.	72828						72.7282
d	Assets attracting passive activity interest expense											
7	Basis in stock of 10%-owned noncontrolled foreign corporations (see attachment)											
	Basis in stock of CFCs (see attachment)											
Se	ction 3—Foreign-Derived Intangible Ir	ncome (FD	II) Deduct	ion App	ortionmen	t Facto	ors					
	Description	(a) U.S	. source		Passive ory income	(c	eign Source c) General gory income	(catego	(d) Other ory code) try code)	(e) Sourc partn	,	(f) Total
1	Foreign-derived gross receipts											
2	Cost of goods sold (COGS)											

3 Partnership deductions allocable to foreignderived gross receipts 4 Other partnership deductions apportioned to foreign-derived gross receipts

Schedule K-3 (Form 1065) 2024						Page 8
Name of partnership	EIN		Name of partner		SSN or TI	N
GRANITE REAL ESTATE INVESTMENT TRUST	98-6	6068269	PRO FORMA PER U	NIT		
Part III Other Information for Preparation	n of Form 1116	or 1118 (con:	tinued)		•	
Section 4—Foreign Taxes		,	,			
Para dell'an	(a) T (1	(b) Section	n 951A category income	(c) F	oreign branch category i	ncome
Description	(a) Type of tax	U.S.	Foreign	U.S.	Foreign	Partner
1 Direct (section 901 or 903) foreign taxes: Paid Accrued A B						
C						
D						
E						
F						
2 Reduction of taxes (total)						
A Taxes on foreign mineral income						
B Reserved for future use						
C International boycott provisions						
D Failure-to-file penalties						
E Taxes with respect to splitter arrangements						
F Taxes on foreign corporate distributions						
G Other						
3 Foreign tax redeterminations						
Related tax year: Date tax paid: Contested tax						
Related tax year: Date tax paid: Contested tax						
Related tax year: Date tax paid: Contested tax						
4 Reserved for future use						
5 Reserved for future use						

6 Reserved for future use

Sche	dule K-3 (Form 1065) 2	2024											Page
Name	e of partnership			EIN		I	Name of par				5	SSN or TIN	•
	ANITE REAL ES	STATE INVESTM	IENT TRUST	98	8-6068269) F	PRO FOR	RMA PER U	NIT				
			r Preparation of	Form 11	16 or 1118	B (continu	ed)						
Se	ction 4—Forei	gn Taxes (continu	ued)										
		(d) Passive categ	ory income			(€	e) General	category incom	ne		(f) Other		
	U.S.	Foreign	n Part	ner	U.	.S.	F	oreign		Partner	(category code _)	(g) Total
1 A B													
C													
D													
E													
F													
2 A													
В													
С	;												
D)												
Е													
F													
G	ì												
3													
A B													
C													
4													
5													
6													
Se	ction 5-Other	Tax Information	1				•	'		'			
						Foreign	Source						
	Description	(a) U.S. source	(b) Section 951A category income		eign branch ory income	(d) Pa category		(e) Gener		(f) Other (category code (country code	(g) Sour parti		(h) Total
1	Section 743(b) positive income adjustment .												
2	Section 743(b) negative income adjustment .												
3	Reserved for future use												
4	Reserved for												

future use . .

Name	e of partnership	EIN	Name of partner			SSN or TIN	
GRA	ANITE REAL ESTATE INVESTMENT TRUST	98-6068269	PRO FORMA PE	R UNIT			
	art IV Information on Partner's Section 250	Deduction With Respe			e (FDII)		
	ction 1—Information To Determine Deduction I					m 8993	
1	Net income (loss)					1	3.09195
2a	DEI gross receipts					2a	4.48078
b	DEI COGS					2b	
С	DEI properly allocated and apportioned deductions					2c	1.38883
3	Reserved for future use					3	
4	Controlled foreign corporation (CFC) dividends					4	
5	Financial services income					5	
6	Domestic oil and gas extraction income					6	
7	Foreign branch income					7	
8	Partnership QBAI					8	
Se	ction 2—Information To Determine Foreign-De	rived Deduction Eligible	e Income (FDDEI) or	Form 8993 (see ins	tructions)		
	Description		(a) Foreign-derived income from all sales of general property	(b) Foreign-derived income from all sales of intangible property	(c) Foreign-der income from all se	ived ervices	(d) Total (add columns (a) through (c))
9	Gross receipts						
10	COGS						
11	Allocable deductions						
12	Other apportioned deductions					12	
Se	ction 3—Other Information for Preparation of F	orm 8993					
	Descript	ion		(a) DEI	(b) FDDEI		(c) Total
	Interest deductions						
	Interest expense specifically allocable under Regulations sec						
	Other interest expense specifically allocable under Regulatio						
	Other interest expense		<u> </u>				0.98836
	Interest expense apportionment factors			70.04000			70.04000
	Total average value of assets			72.81300			72.81300
В							
C							
	Other assets attracting directly allocable interest expense un						
	Assets excluded from apportionment formula			72.01200			70.01200
	Total assets used for apportionment (the sum of lines 14C, 14E	,	sum of lines 14A and 14B)	72.81300			72.81300
	R&E expenses appor	tionment factors					
_	Gross receipts by SIC code						
A							
B C	010						
	R&E expenses by SIC code				<u> </u>		
	SIC code:					16A	
	SIC code:					16B	
						16C	
	SIC code:					100	

Name	of partnership		EIN	Na	ıme of pai	tner		SSN or TIN
GRA	NITE REAL ESTATE INVE	ESTMENT TRUST	98-60682	69 PF	RO FOI	RMA PER UNIT		
Pa	art V Distributions Fr	om Foreign Corporati	ions to Partners	hip			·	
	(a) Name of c	distributing foreign corporation	on	(b) EIN o	or number	(c) Date of distribution	(d) Functional currency of distributing foreign corporation	(e) Amount of distribution in functional currency
Α								
В								
С								
D								
Е								
F								
G								
Н								
J								
K								
L								
M								
N								
0			T		1			
	(f) Amount of E&P distribution in functional currency	(g) Spot rate (functional currency to U.S. dollars)	(h) Amount of in U.S.	of distribution dollars	(i) Am	ount of E&P distribution in U.S. dollars	(j) Qualified foreign corporation	(k) Reserved for future use
Α								
В								
С								
D								
E								
F								
G								
<u>H</u>								
J					1			
K								
_ <u>L</u>					-			
M								
<u>N</u>					 			
0					1			

Sched	ule K-3 (Form 1065) 2024											Page 1 2
Name	of partnership			EIN			Name of partner				SSN o	r TIN
GRA	NITE REAL ESTATE	INVESTMENT	Γ TRUST		98-60682	59	PRO FORM	A PE	ER UNIT			
	rt VI Informatio	n on Partner's	Section 95	1(a)(1)	and Sectio	n 951A	Inclusions		-			
а	Separate category (code)											
	If box is checked, this is c											
	(a) Name of		(b) EIN o	or	(c) Ending of tax year	CFC	(d) Partner's sha CFC items throug ownership in the partnership	gh its	(e) Partner's share of subpart F income		er's section B) inclusion	(g) Tested income
Α												
 B												
C												
E												
F												
 G												
Н												
_ <u></u>												
<u>'</u>												
K												
	Partner's total (sum for a	JII CECo)										
	Partifier 5 total (Suffi for a		<u></u>	· ·			<u> </u>	Τ.				
	(h) Tested loss	(i) Partner's sh tested inco			r's share of ed loss	(k) P	artner's share of QBAI	(Partner's share of the tested loss QBAI amount	(m) Partner's tested interes		(n) Partner's share of tested interest expense
Α	()		()			()			
В	()		()			()			
С	(()			()			
D	())	()			()			
E	(()			()			
	()		ì)			()			
G	()		()			()			
Н	()		()			()			

J (

	,								
Name o	of partnership	E	EIN	Name of partner				SSN or TIN	•
GRA	NITE REAL ESTATE INVESTME	ENT TRUST	98-6068269	PRO FORMA PE	R UNIT				
	rt VII Information Regardin		n Investment Compa	nies (PFICs)					
Sec	tion 1—General Information								
			Gener	al Information					
	(a) Name of PFIC		(b) EIN or reference ID number	(c) Addre	ss of PFIC		(d) Beginnir PFIC tax y) Ending of FIC tax year
Α									
В									
С									
D									
E									
F									
G									
_ Н									
J									
<u>K</u>									
L	9.		faatia		1	luda	tion Domendin	Floations	
	Si	ummary of Annual Inf	formation				tion Regarding	Elections	1
	(f) Description of each class of PFIC shares	(g) Dates PFIC shares acquired during tax year (if applicable)	(h) Partner's share of total number of PFIC shares held by partnership at end of tax year	(i) Partner's share of total value of PFIC shares held by partnership at end of tax year	(j) Election made by partnership (see instructions)	(k) Box is checked if foreign corporation has documented its eligibility to be treated as a qualifying insurance corporation under section 1297(f)(2).	(I) Box is checked if PFIC has indicated its shares are "marketable stock" within the meaning of section 1296(e).	(m) Box is checked if PFIC is also a CFC within the meaning of section 957.	(n) Box is checked if PFIC meets the income test or asset test of section 1297(a) for the tax year.
Α									
<u>B</u>								 	
E									
F									
G									
<u> </u>									
I 									
K									

Name	of partnership	EIN	Name of partner	SSN or TIN	
GRA	NITE REAL ESTATE INVESTMENT TRUST	98-6068269	PRO FORMA PER UNIT		

Part VII Information Regarding Passive Foreign Investment Companies (PFICs) (continued)
Section 2—Additional Information on PFIC or Qualified Electing Fund (QEF)

	General Information		QEF Inf	ormation	Section 1296 Mark-to	o-Market Information	Section 1291 and Other Information
	(a) Name of PFIC	(b) EIN or reference ID number	(c) Partner's share of ordinary earnings	(d) Partner's share of net capital gain	(e) Partner's share of fair market value (FMV) of PFIC shares held by partnership at beginning of tax year	(f) Partner's share of FMV of PFIC shares held by partnership at end of tax year	(g) Dates PFIC shares were acquired
Α							
В							
С							
D							
E							
F							
G							
Н							
- 1	<u> </u>						
J	<u> </u>						
K							
L							

Section 1291 and Other Information

	(h) Partner's share of amount of cash and FMV of property distributed by PFIC during the current tax year (if applicable)	(i) Dates of distribution	(j) Partner's share of total creditable foreign taxes attributable to distribution by PFIC	(k) Partner's share of total distributions from PFIC in preceding 3 tax years	(I) Dates PFIC shares disposed of during tax year (if applicable)	(m) Partner's share of amount realized by partnership on disposition of PFIC shares	(n) Partner's share of partnership's tax basis in PFIC shares on dates of disposition (including partner-specific adjustments)	l diamonitian hu
Α								
В								
С								
D								
E								
F								
G								
Н								
J								
K								
L								

Name of partnership		EIN		Name of partner	SSN or TIN				
GR.	GRANITE REAL ESTATE INVESTMENT TRUST		8-6068269	PRO FORMA PER UNIT					
Pa	art VIII Partner's Interest in Foreign Corpora	ation Inc	ome (Section 960	0)					
Α	EIN or reference ID number of CFC		B Separate category. See instructions						
С	If PAS was entered on line B, applicable grouping under Reg	ulations se	ction 1.904-4(c). See i	nstructions					
D	Box is checked if there is more than one source country for a	a line. See a	attachment and instruc	ctions E Box is chec	cked if U.S. source income				
F	Box is checked if foreign oil related income or foreign oil and	l gas extrac	ction income	G Functional currency of foreign	gn corporation				
	Amounts are in functional currency unless otherwise noted. See instructions.		(i) Country code	(ii) Partner's share of foreign corporation's net income (functional currency)	(iii) Foreign corporation's total net income (functional currency) (see instructions)	(iv) Foreign corporation's current year foreign taxes for which credit allowed (U.S. dollars) (see instructions)			
1	Subpart F income groups								
а	Dividends, interest, rents, royalties, and annuities (total) .								
	(1) Unit:								
	(2) Unit:								
b	Net gain from certain property transactions (total)								
	(1) Unit:								
	(2) Unit:								
С	Net gain from commodities transactions (total)								
	(1) Unit:								
	(2) Unit:								
d	Net foreign currency gain (total)								
	(1) Unit:								
	(2) Unit:								
е	Income equivalent to interest (total)								
	(1) Unit:								
	(2) Unit:								
f	Other foreign personal holding company income (total) .								
	(1) Unit:								
	(2) Unit:								
g	Foreign base company sales income (total)								
	(1) Unit:								
	(2) Unit:								
h	Foreign base company services income (total)								
	(1) Unit:								
	(2) Unit:								
i	Full inclusion foreign base company income (total)								
	(1) Unit:								
	(2) Unit:								
j	Insurance income (total)								
	(1) Unit:								
	(2) Unit:								
	International boycott income (total)								
	Bribes, kickbacks, and other payments (total)								
n	1 Section 901(j) (total)								

Name	of partnership EIN Name of partner				SSN or TIN				
GRA	ANITE REAL ESTATE INVESTMENT TRUST	(98-6068269	PRO FORMA PER UNIT					
Pai	rt VIII Partner's Interest in Foreign Corpora	tion Inc	come (Section 96	0) (continued)					
	Amounts are in functional currency unless otherwise noted. See instructions.	(iii) Partner's share of foreign (iii) Foreign corporation's total							
2	Recaptured subpart F income								,
	Tested income group (total)								
	(1) Unit:								
	(2) Unit:								
4	Residual income group (total)								
	(1) Unit:								
	(2) Unit:								
5	Total								
	art IX Partner's Information for Base Erosic		Anti-Abuse Tax (Section 59A)		•			
Sec	ction 1-Applicable Taxpayer (see instructions for	or more	information and d	efinitions of ter	ms)				
	Description	n			(a) To	otal	(b) Total ECI gros	ss	(c) Total non-ECI gross receipts
1	Gross receipts for section 59A(e)					4.48078	receipts		4.48078
	4.00-00						4.3		
						3.15709			3.15709
4						2.60376			2.60376
5	Amounts included in the denominator of the base erosion					2.00070			2.0007.0
	1.59A-2(e)(3)					1.38883			
Sec	ction 2—Base Erosion Payments and Base Eros								
	Description	1	· ·	,	(a) To	otal	(b) Total base eros payments	ion	(c) Total base erosion tax benefits
6	Reserved for future use								
7	Cost sharing transaction payments								
8	Purchase or creations of property rights for intangibles (pat	ents, trad	emarks, etc.)						
9	Rents, royalties, and license fees								
10a	Compensation/consideration paid for services not excepte	d by secti	on 59A(d)(5)						
b	Compensation/consideration paid for services excepted by	section 5	59A(d)(5)						
11	Interest expense					0.98836			
12	Payments for the purchase of tangible personal property								
13	Premiums and/or other considerations paid or accrued for sections 59A(d)(3) and 59A(c)(2)(A)(iii)								
14a									
b	Qualified derivative payments excepted by section 59A(h)								
15	Payments reducing gross receipts made to surrogate foreig								
16	Other payments—specify: OTHER PAYMENTS					0.40047			
17	Base erosion tax benefits related to payments reported on section 871, 881, or 884(f), with respect to which tax has be 30% statutory withholding tax rate or subject to tax under featutory rate (see instructions)	een withhe Regulation	eld under section 1441 ns section 1.884-4(a)(2)	or 1442 at the)(ii) at the 30%					

Name of partnership	EIN	Name of partner	SSN or TIN
GRANITE REAL ESTATE INVESTMENT TRUST	98-6068269	PRO FORMA PER UNIT	

Part IX Partner's Information for Base Erosion and Anti-Abuse Tax (Section 59A) (continued)

Section 2—Base Erosion Payments and Base Erosion Tax Benefits (see instructions) (continued)

	Description	(a) Total	(b) Total base erosion payments	(c) Total base erosion tax benefits
18	Portion of base erosion tax benefits reported on lines 6 through 16, on which tax is imposed by section 871 or 881, with respect to which tax has been withheld under section 1441 or 1442 at reduced withholding rate pursuant to income tax treaty or subject to a reduced rate of tax under Regulations section 1.884-4(a)(2)(ii). Multiply the amount of the base erosion tax benefit by a fraction equal to the rate of tax imposed under the treaty over the 30% (0.30) statutory rate. See instructions			
19	Total base erosion tax benefits (subtract the sum of lines 17 and 18 from the sum of lines 7 through 16).			
20	Reserved for future use			
21	Reserved for future use			
22	Reserved for future use			

Part X Foreign Partner's Character and Source of Income and Deductions

Section 1—Gross Income

				Partnership Determination				
	Description	(a) Total	(b) Partner	E	CI		Non-ECI	
	Description	(a) Total	determination	(c) U.S. source	(d) Foreign source	(e) U.S. source (FDAP)	(f) U.S. source (other)	(g) Foreign source
1	Ordinary business income (gross)							
2	Gross rental real estate income							
3	Other gross rental income							
4	Guaranteed payments for services .							
5	Guaranteed payments for use of capital							
6	Interest income	2.64423				1.51620		1.12803
7	Dividends	1.42138				0.05996		1.36142
8	Dividend equivalents							
9	Royalties and license fees							
10	Net short-term capital gain							
11	Net long-term capital gain							
12	Collectibles (28%) gain							
13	Unrecaptured section 1250 gain							
14	Net section 1231 gain							
15	Reserved for future use							
16	Reserved for future use							
17	Reserved for future use							
18	Reserved for future use							
19	Reserved for future use							
20	Other income not included on lines 1							
	through 19	0.41517	0.01227			0.15018		0.25272
21	Gross income (sum of lines 1							
	through 20)	4.48078	0.01227			1.72634		2.74217

Name of partnership	EIN	Name of partner	SSN or TIN
GRANITE REAL ESTATE INVESTMENT TRUST	98-6068269	PRO FORMA PER UNIT	

Foreign Partner's Character and Source of Income and Deductions (continued)

				Partnership Determination						
	Description	Description (a) Total (b) Partner		E	CI	Non-ECI				
	Description	(a) Total	determination	(c) U.S. source	(d) Foreign source	(e) U.S. source (FDAP)	(f) U.S. source (other)	(g) Foreign source		
1	Expenses related to ordinary business income (gross)									
2	R&E expenses									
3	Expenses from rental real estate									
4	Expenses from other rental activities .									
5	Royalty and licensing expenses									
6	Section 179 deduction									
7	Interest expense on U.Sbooked liabilities									
8	Interest expense directly allocable under Regulations sections 1.882-5(a)(1)(ii)(B) and 1.861-10T									
9	Other interest expense	0.98836	0.98836							
10	Section 59(e)(2) expenditures									
11	Net short-term capital loss									
12	Net long-term capital loss									
13	Collectibles loss									
14	Net section 1231 loss									
15	Other losses									
	(1) SECTION 988 LOSS	0.00256	0.00256							
	(2) OTHER LOSSES	0.02192	0.02192							
16	Charitable contributions									
17	Other: OTHER DEDUCTIONS	0.37599						0.3759		
18	Other:									
19	Reserved for future use									
20	Reserved for future use									
21	Reserved for future use									
22	Reserved for future use									
23	Reserved for future use									
24	Total (sum of lines 1 through 23)	1.38883	1.01284					0.3759		
25	Net income (loss) (line 21 (Section 1) minus line 24 (Section 2))	3.09195								

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Name of partnership EIN			EIN	Name of partner					SSN or TIN
GRAI	NITE REAL ES	STATE INVESTMENT TRUST	98-6068269	PRC	FORM	IA PER	UNIT		
			Source of Income and Deduc	ctions	s (contii	nued)			
Sec	tion 3—Alloca	tion and Apportionment Me	thods for Deductions						
1	Gross income			6	Reserv	ed for fu	ture use		
а	Gross ECI					(i)	(ii)		(iii)
b	Worldwide gross	s income	. 4.48078	а					
				b					
2	Assets								
а		sets (inside basis)		7	Other a	allocation	and apportionment	key	
b	Worldwide asset	ts	·				(i) Key/Factor		(ii) Allocation
				а					
3	Liabilities			b					
a		pilities of partnership			011				
b	Directly allocated	d partnership indebtedness	•	8	Other a	allocation	and apportionment	кеу	(**) All 1*
	Demonstra						(i) Key/Factor		(ii) Allocation
4	Personnel	trada ar businasa		a					
a b		S. trade or business		b					
b	wondwide perso		•						
5	Gross receints fo	rom sales or services by SIC code							
Ū	(i) SIC code	(ii) ECI	(iii) Worldwide						
а	(,) 0.0 0000	(.,, ==:	(iii) trailianida						
b									
Cast	tion 4 Decem	und for Fritzing Hoo							
Sec	ion 4—Reser	ved for Future Use	erved				(a) Reserved	(b) Reserved	(c) Reserved
4	Decembed for first						(a) Reserved	(b) Reserved	(c) Reserved
2	_								
3	_								
4	•								
5									
6	-								
7	•								
8	•								
9	•								
10									

Sched	ule K-3 (Form 1065) 2024								Page 20
Name	of partnership		EIN		Name of partner			SSN or TII	N
Pa	rt XI Section 871(m) Cover	ed Partnerships	.						
1 2 3	Box is checked if the partnership is a proof (b) directly or indirectly holds an internumber of units held by the partner: For each allocation period, see the following the partner is a property of the partnership is a partnership in the partnership in the partnership is a partnership in the part	rest in a lower-tier pa	artnership that is a d	covered partners	ship				
	(a) Beginning of allocation period	(b) End of alloc		(c) [Dividends cimal places)		ridend equivalents decimal places)		(e) Total decimal places)
	rt XII Section 871(m) Tax Li	ability of a Qual	ified Derivative	es Dealer (C	(DD)				
Name	of QDD							Schedule	of
	te the year or portion of the year to which inning, 2			•	-	g dates.)			
	Summary	of QDD Tax Liabil	lity		(a) Gross	amount	(b) Withholding tax ra		Amount of tax liability umn (a) x column (b))
1	Total section 871(m) amount								
2	Total dividends received in equity deriv	atives dealer capaci	ty						
3	Total QDD tax liability pursuant to secti	ion 3.09(A) of the Qu	alified Intermediary	/ Agreement (QI	A)				
4	Total QDD tax liability pursuant to secti	ion 3.09(B) of the QIA	A						
5	Total QDD tax liability pursuant to secti	ion 3.09(C) of the QIA	4						
а	Income type:				_				
b	Income type:				_				
С	Income type:				_				
d	Income type:				_				
е	Income type:				_				
f	Income type:				_				
g	Income type:								
6	Total of line 5 amounts								

Schedule K-3 (Form 1065) 2024 Page **21** Name of partnership EIN SSN or TIN Name of partner Foreign Partner's Distributive Share of Deemed Sale Items on Transfer of Partnership Interest Part XIII Date of transfer of the partnership interest **B1** Percentage interest in the partnership **B2** Number of units in the partnership B3 Reserved for future use transferred transferred Check if: 1 Capital 2 Preferred 3 Profits 4 Other Partner's Distributive Share 1 2 2 3 3 4 4 Aggregate effectively connected gain that would be recognized on the deemed sale of section 1(h)(6) unrecaptured section 1250 gain assets 5 5 Check this box if any amount on lines 2 through 5 is determined (in whole or in part) under Regulations section 1.864(c)(8)-1(c)(2)(ii)(E) (material 7 7

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