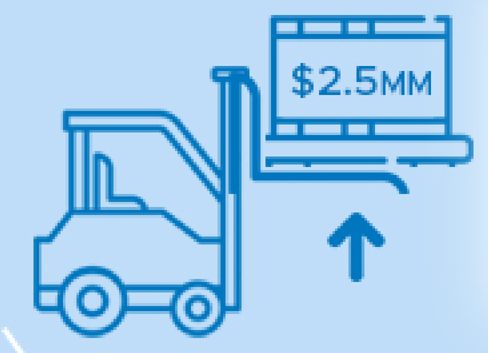
PROVISIONS & IMPACT OF ONE BIG BEAUTIFUL BILL

1. Section 179 Cap Increase

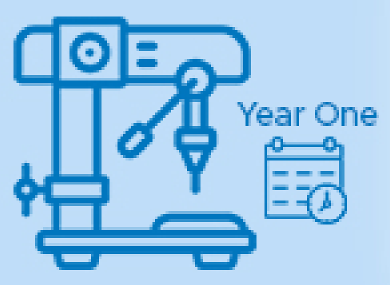
Immediate expensing window more than doubles from $1MM to $2.5MM. Phase out has increased to $4MM.



SECTION 111103 - THE BUSINESS IMPACT:
Companies can now expense a larger amount in CapEX in year one, translating into faster payback on financed equipment and a bigger first-year tax shield.

2. 100% Bonus Depreciation Now Permanent

Big-ticket assets no longer trickle through depreciation schedules.



SECTION 111001 - THE BUSINESS IMPACT:
This enables companies to accelerate tax savings by allowing a full deduction of qualifying asset costs—such as equipment, furniture, and land improvements—in the first year of use.

3. Ehancement to Interest Deduction

The bill permanently reinstates a higher business interest expense deduction, based on EBITDA rather than EBIT.

SECTION 163(j) - THE BUSINESS IMPACT:
It is now easier for companies to deduct interest expenses by changing how the limit is calculated. Instead of using earnings after depreciation and amortization (EBIT), the new rule uses earnings before those costs (EBITDA), allowing for larger interest deductions.

4. Immediate Expensing of Domestic R&D Outlays

Domestic research and development (R&D) costs are now fully deductible.

SECTION 174 - THE BUSINESS IMPACT:
No more five-year amortization drag. Every R&D dollar becomes a current-year deduction. However, foreign R&D must still be amortized over 15 years.

5. Pass Through Deduction Now Permanent

The provision lets eligible business owners deduct up to 20% of their qualified business income (QBI).

SECTION 199A - THE BUSINESS IMPACT:
The pass-through deduction of up to 20% was originally scheduled to expire at the end of 2025. However, the new bill has made this deduction permanent.

Wingspire EQUIPMENT FINANCE

Wingspire Equipment Finance delivers financial solutions primarily to private equity-owned, middle market companies operating in capital intensive industries. Backed by funds managed by Blue Owl Capital (NYSE: OWL), a leading asset manager with over $273B in AUM, we provide financing from $5MM to over $100MM on essential use equipment.