



**Part II Organizational Action** (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ The adjustment to a stockholder's basis in their shares is determined pursuant to Section 1221 of the Internal Revenue Code.

18 Can any resulting loss be recognized? ▶ We intend to treat the Reverse Split as a 'recapitalization' for U.S. federal income tax purposes and that any rounding up of fractional shares to the next full share that may apply to a U.S. stockholder will be solely to spare us the expense and inconvenience of issuing fractional shares and will not represent separately bargained for consideration paid to a U.S. stockholder. As a result, a U.S. stockholder generally should not recognize gain or loss upon the Reverse Stock Split. A U.S. stockholder's aggregate tax basis in the shares of common stock received pursuant to the Reverse Stock Split should equal the aggregate tax basis of the shares of common stock surrendered, and such U.S. stockholder's holding period for the shares of the common stock received should include the holding period for the shares of common surrendered. Treasury Regulations provide detailed rules for allocating the tax basis and holding period of the shares of common stock received in a recapitalization pursuant to the Reverse Stock Split. U.S. stockholders should consult their tax advisors as to the application of the foregoing rules where shares of common stock were acquired at different times or at different prices.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The reportable tax year is 2026.

**STOCKHOLDERS SHOULD CONSULT THEIR TAX ADVISORS WITH RESPECT TO THE APPLICATION OF THE U.S. FEDERAL INCOME TAX LAWS TO THEIR PARTICULAR SITUATIONS AS WELL AS ANY TAX CONSEQUENCES OF THE REVERSE SPLIT ARISING UNDER U.S. FEDERAL ESTATE OR GIFT TAX LAWS OR UNDER THE LAWS OF ANY STATE, LOCAL OR NON-U.S. TAXING JURISDICTION OR UNDER ANY APPLICABLE INCOME TAX TREATY.**

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 ▶ *Pam Haley* Date ▶ 5/03/2026  
Print your name ▶ Pam Haley Title ▶ VP Accounting

<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶				Firm's EIN ▶
	Firm's address ▶				Phone no.

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054