# Form 8937 (December 2017) Department of the Treasury Internal Revenue Service

# Report of Organizational Actions Affecting Basis of Securities

OMB No. 1545-0123

► See separate instructions.

Р	art I Reporting Issuer	r						
1	Issuer's name		2 Issuer's employer identification number (EIN)					
	GLOBALLOGIC WORLDWIDE HOLDIN	NGS INC.			83-0639	83-0639964		
3	Name of contact for additional in	nformati	on	4 Telephone No. of contact	5 Email a	5 Email address of contact		
	INVESTOR RELATIONS			408-273-8900	FINANCE@GLOBALLOGIC.COM			
6	Number and street (or P.O. box if mail is not delivered to street 1741 TECHNOLOGY DRIVE, 4TH FLOOR			address) of contact	7 City, town, or post office, state, and Zip code of contact			
				SAN JO		JOSE CA 95110		
8 Date of action 9 Classification and description			escription					
	9/22/2020			VIDE HOLDINGS INC. COMMON STOCK	<	1		
10	CUSIP number 1	1 Serial	I number(s)	12 Ticker symbol		13 Account num	ber(s)	
P	art II Organizational A	ction	Attach additional staten	ments if needed. See second pa	age of form	for additional questi	ions.	
14	Part II Organizational Action Attach additional statements if needed. See second page 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 ▶ SEE ATTACHMENT							
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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 postare or as a percentage of old basis ► SEE ATTACHMENT								
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Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities a valuation dates SEE ATTACHMENT							curities and the	
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Part II Organizational Action (continued)

rait	. 11	organizational Action (continued)								
17	List the a	applicable Internal Revenue Code section	(s) and subsection(s) upon which	the tax treatment is based ▶SE	E ATTACHMENT					
18	Can any	resulting loss be recognized? ▶SEE ATTA	CHMENT							
			<del></del>							
				N CEE ATTACL	IMENT					
19 	Provide	any other information necessary to implen	nent the adjustment, such as the r	eportable tax year	TIMEN					
	Unde	r panalties of pariury. I declare that I have examine	d this return, including accompanying so	hadules and statements, and to the h	act of my knowledge and					
		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.								
Sigi	<b>.</b>									
Her		ature <b>&gt;</b>		Date ▶						
Batto /										
	Print	your name ►A SIGNED COPY IS MAINTAINED	BY THE ISSUER	Title ▶						
	1	Print/Type preparer's name	Preparer's signature	Date	Check if PTIN					
Pai	d				self- employed					
	parei		•	•	Firm's EIN ▶					
		<b>y</b> Firm's address ▶			Phone no.					
		37 (including accompanying statements) t	o: Department of the Treasury, Int	ernal Revenue Service, Ogden,	UT 84201- 0054					

US8937P2

# GlobalLogic Worldwide Holdings Inc. EIN 83-0639964

# **Attachment to Form 8937**

# Report of Organizational Actions Affecting Basis of Securities Security: GlobalLogic Worldwide Holdings Inc. Common Stock

Current IRS guidance under Section 6045B provides that if a company issues a cash distribution with respect to its stock, that affects the basis of such stock, an information return on Form 8937 must be filed with the IRS, or in lieu of filing, posted on the company's public website.

The information contained in the Form 8937 and this attachment is intended to satisfy those requirements and is intended to provide a general summary of certain U.S. federal income tax consequences of the distributions. This information does not constitute tax advice and does not purport to take into account any holder's specific circumstances. Holders are urged to consult their own tax advisors regarding the U.S. tax consequences of the adjustments described herein and the impact to tax basis resulting from the adjustments.

# GlobalLogic Worldwide Holdings Inc. EIN 83-0639964

## **Attachment to Form 8937**

# Report of Organizational Actions Affecting Basis of Securities Security: GlobalLogic Worldwide Holdings Inc. Common Stock

## Form 8937, Part II, Line 14

On September 22, 2020, GlobalLogic Worldwide Holdings Inc. (the "Company") paid a cash distribution of \$475,000,000 which was approximately \$35.39 for each issued and outstanding share of the Company's Common Stock ("common stock"), with the exception of the shares issued as Class C-2 common stock, to the stockholders of record as of September 22, 2020.

#### Form 8937, Part II, Line 15

For U.S. federal income tax purposes, the Company expects \$80,000,000 of the cash distribution to be treated as a dividend, and the remaining \$395,000,000 to be applied against and reduce the shareholders' adjusted basis in the Company stock, with any amounts received in excess of adjusted basis to be treated as gain from the sale or exchange of property. This is based on the Company's estimate that it will have \$80,000,000 of earnings and profits (both current year and accumulated) at the end of its taxable year ending on March 31, 2021. Accordingly, of the \$35.39 received per share, \$5.96 (i.e., 16.842 percent) is expected to be classified as a dividend under Internal ("IRC") section 301(c)(1) that has no effect on basis, with the remaining \$29.43 (i.e., 83.158 percent) applied to reduce (but not below zero) a shareholder's adjusted basis in the Company stock under IRC section 301(c)(2), and any amounts in received in excess of the shareholder's adjusted basis in the stock to be classified as gain from the sale or exchange of property under IRC section 301(c)(3). The Company may file a corrected Form 8937 if there is a change of estimate to any of the items discussed herein.

#### Form 8937, Part II, Line 16

A shareholder's adjusted tax basis from the distribution should be calculated using the method described in Part II, Line 15. Shareholders should appropriately account for any non-dividend distribution in the calculation of their total basis in the common stock. For example, if a shareholder with one share of common stock (with a tax basis of \$1,000) received \$35.39 in cash, then \$29.43 (i.e., 83.158 percent of the total distribution) would be treated as a return of capital and immediately following the distribution the shareholder would have one share with an adjusted basis of \$970.57. Shareholders should consult their tax advisors to determine the tax consequences of the adjustments to them.

# Form 8937, Part II, Line 17

IRC sections 301(c)(1) and 301(c)(2)

## Form 8937, Part II, Line 18

This is not a loss transaction.

### Form 8937, Part II, Line 19

The reportable tax year is 2020 for a calendar year taxpayer.