

Part II Organizational Action (continued)

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

18 Can any resulting loss be recognized? ▶SEE ATTACHMENT

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶SEE ATTACHMENT

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 ▶

Print your name ▶ A SIGNED COPY IS MAINTAINED BY THE ISSUER Title ▶

Paid Preparer Use Only

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

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

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 9937

Report of Organizational Actions Affecting Basis of Securities

Security: GlobalLogic Worldwide Holdings Inc. Common Stock

Form 9937, 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 9937, 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 9937 if there is a change of estimate to any of the items discussed herein.

Form 9937, 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 9937, Part II, Line 17

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

Form 9937, Part II, Line 18

This is not a loss transaction.

Form 9937, Part II, Line 19

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