



**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](#)

**Sign  
Here**

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.

Signature ▶



Date ▶ 8/28/26

Print your name ▶ Jason Bates

Title ▶ President & CFO

**Paid  
Preparer  
Use Only**

Print/Type preparer's name

Christopher W. Woll

Preparer's signature



Date

August 28, 2026

Check ☐ if  
self-employed

PTIN

Firm's name ▶ KPMG LLP

Firm's EIN ▶ 13-5565207

Firm's address ▶ 200 E. Randolph Dr., Suite 5500, Chicago, IL 60601

Phone no. 312-665-1372

**Report of Organizational Action Affecting Basis of Securities**

Disclaimer: The information contained in Form 8937 and this attachment does not constitute tax advice and does not purport to take into account any note holder's specific circumstances. Note holders are urged to consult their own tax advisors regarding U.S. tax consequences of the transaction described herein and the impact to tax basis resulting from the transaction.

**Form 8937 – Part I – Line 9**

***Classification and description***

*Old Specified Securities*

- Term loan facilities issued by Quantix Holdings, LLC (EIN: 87-4061933) (“**Quantix Holdings**”) on May 3, 2019 (the “**Original 1L Term Loan**”).
- Revolving loan facilities issued by Quantix Holdings on April 1, 2024 (the “**Original Revolver**” and collectively with the Original 1L Term Loan, the “**Existing Debt**”).

*New Specified Securities*

- Term loan facilities issued by Quantix Holdings pursuant to the Amended and Restated Credit Agreement, dated as of July 17, 2026 (the “**A&R Credit Agreement**”) (the “**B-1 Term Loan**”).
- Term loan facilities issued by Quantix Holdings pursuant to the A&R Credit Agreement (the “**B-2 Term Loan**”).
- Term loan facilities issued by Quantix Holdings pursuant to the A&R Credit Agreement (the “**Term A Loan**” and collectively with the B-1 Term Loan and B-2 Term Loan, the “**Modified Debt**”).

**Form 8937 – Part II – Line 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***

Pursuant to the Exchange Agreement, dated as of July 16, 2026, and the A&R Credit Agreement, on July 17, 2026, (i) the Original 1L Term Loan was modified into the B-1 Term Loan and B-2 Term Loan, and (ii) the Original Revolver was modified into the Term A Loan (collectively, the “**Modification**”).

**Form 8937 – Part II – Line 15**

***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 per share or as a percentage of old basis***

The Modification is intended to constitute a “significant modification” of the Existing Debt under Treas. Reg. § 1.1001-3, resulting in a deemed exchange of the original debt for new debt with modified terms for U.S. federal income tax purposes. Consequently, holders of the Existing Debt (the “**1L Lenders**”) are expected to realize (but, subject to the recapitalization rules discussed below, not necessarily recognize) gain or loss (if any) as a result of the Modification. The resulting tax treatment of the Modification depends on whether it constitutes a recapitalization under section 368(a)(1)(E), which depends *inter alia* on whether the Existing Debt and Modified Debt constitute “securities” for purposes of section 354.

If the Existing Debt and Modified Debt are determined to constitute securities for purposes of section 354, and the exchange of those securities in the Modification otherwise qualifies as a recapitalization in accordance with section 368(a)(1)(E), the 1L Lenders are generally not expected to recognize gain or loss

with respect to such exchange, except to the extent cash (other than cash for accrued and unpaid interest) or other property (i.e., boot) is received in addition to stock or securities to which section 354 would apply. To the extent the Modification qualifies as a recapitalization under section 368(a)(1)(E), the 1L Lender's aggregate adjusted tax basis in the Modified Debt received in such exchange is expected to equal its adjusted tax basis in the Existing Debt, decreased by the fair market value of any boot received and increased by any gain recognized by the taxpayer on such exchange. Such tax basis is expected to be allocated to the Modified Debt based on each instrument's relative fair market value in cases where a 1L Lender receives both B-1 Term Loans and B-2 Term Loans.

If the exchange of the Existing Debt does not qualify as a section 368 recapitalization, the Modification is expected to be treated as a taxable exchange under section 1001. The 1L Lenders are expected in that case to recognize gain or loss (subject to other applicable Code provisions) on the Modification equal to the difference between the issue price of the Modified Debt received and their aggregate tax basis in the Existing Debt. In the case of a taxable exchange, the 1L Lender's aggregate initial tax basis in the Modified Debt is expected to equal the issue price of such debt instruments.

1L Lenders should consult their tax advisors to determine the U.S. federal income tax consequences of the Modification to them.

**Form 8937 – Part II – Line 16**

***Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates***

See response to Line 15 above.

If the Modification is a section 368 recapitalization, each 1L Lender's aggregate initial tax basis in the Modified Debt is expected to equal its aggregate adjusted tax basis in the Existing Debt, decreased by the fair market value of any boot received and increased by any gain recognized by the 1L Lender on such exchange. Such aggregate basis is then expected to be allocated among the Modified Debt based on each instrument's relative fair market value in cases where a 1L Lender receives both B-1 Term Loans and B-2 Term Loans.

If the Modification is treated as an exchange that does not qualify as a section 368 recapitalization, the 1L Lender's aggregate initial tax basis in the Modified Debt is expected to equal the issue price of such debt instruments.

**Form 8937 – Part II – Line 17**

***List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based***

Sections 354, 356, 358, 368, 1001, 1012

**Form 8937 – Part II – Line 18**

***Can any resulting loss be recognized?***

The Modification may result in a 1L Lender recognizing a loss if such 1L Lender's tax basis in the Existing Debt exceeds the issue price of the Modified Debt, subject to generally applicable Code rules that may impact the ability of a particular 1L Lender to recognize losses.

**Form 8937 – Part II – Line 19**

***Provide any other information necessary to implement the adjustment, such as the reportable tax year***

The Modification occurred on July 17, 2026. The reportable tax year is 2026 for calendar-year taxpayers.