



**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 Attached.

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**18** Can any resulting loss be recognized? ▶ N/A.

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

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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 ▶ Volker Barts Date ▶ Dec. 13, 2022  
Print your name ▶ Volker Barts Title ▶ Philippe Dornier

<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.	



**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 Attached.

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18 Can any resulting loss be recognized? ▶ N/A.

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

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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 ▶ Volker Baeth P. Dörmer Date ▶ Dec. 13, 2022  
Print your name ▶ Volker Baeth Philipp Dörmer Title ▶ \_\_\_\_\_

<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.	

## Attachment to Form 8937: Credit Suisse Group AG

### Part II

Box 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.

Credit Suisse Group AG ("CSG"), a Swiss company, allotted Rights to purchase new ordinary shares of CSG to holders, at no cost to such holders, who held ordinary shares of CSG ("Existing Shares") after close of trading on November 25, 2022. Each holder was allotted one Right for each Existing Share such holder held at the time of the allotment. The Rights were reflected in holders' accounts beginning on November 28, 2022, and were available for trading on the SIX Swiss Exchange Ltd during the period from (and including) November 28, 2022 to (and including) December 6, 2022. Each Right entitled the holder to subscribe for new ordinary shares in the ratio of two new shares for every seven Rights held. The price of each new share purchased through exercising the Rights was CHF 2.52. The Rights could be exercised during the period from (and including) November 28, 2022 and 12:00 noon Central European Time December 8, 2022.

Box 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.

A holder's receipt of Rights pursuant to the offering should be treated as a non-taxable distribution with respect to the holder's Existing Shares for U.S. federal income tax purposes. The remainder of this discussion assumes such treatment.

If the Rights were obtained by a holder in a distribution with respect to such holder's Existing Shares, but expire unexercised, then the holder's tax bases in the corresponding Existing Shares will be the same as they were prior to the receipt of the Rights.

If the fair market value of the Rights received by a holder equals less than 15% of the fair market value of the holder's Existing Shares on the date of receipt, the Rights will be allocated a zero basis for U.S. federal income tax purposes, unless such holder affirmatively elects to allocate basis between its Existing Shares and the Rights in proportion to their relative fair market values as determined on the date of receipt. If a holder chooses to allocate basis between its Existing Shares and the Rights, it must make this election in its tax return for the taxable year in which it receives the Rights. Such election is irrevocable once made. On the other hand, if the fair market value of the Rights a holder received equals 15% or more of the fair market value of its Existing Shares on the date of receipt, then, except as discussed in the preceding paragraph, the holder must allocate its basis in its Existing Shares between the Existing Shares and the Rights in proportion to their relative fair market values as determined on the date it receives the Rights.

Although not entirely clear, we have assumed for purposes of the illustrative calculations provided in Part II, Box 16 that the distribution occurred on November 28, 2022, the date when the Rights were first reflected in holders' accounts and when holders could first trade and exercise their Rights.

The method for determining the fair market value of the Rights is uncertain. CSG has not obtained, and does not intend to obtain, an independent appraisal of the fair market value of the Rights on the distribution date. Please see, however, Part II, Box 16 for indicative prices based on publicly available trading information.

Box 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.

The opening price for trading in the Existing Shares was CHF 3.187 on November 28, 2022, and the volume weighted average price (“VWAP”) for that same date of the Existing Shares was CHF 3.0480. The opening price for trading in the Rights was CHF 0.1650 on November 28, 2022, and the VWAP for that same date of the Rights was CHF 0.1494. Based on those valuations, CSG believes that it is appropriate to treat the fair market value of a Right as less than 15% of the fair market value of the related Existing Share on the distribution date, with the result that a holder therefore is not required to allocate basis in its Existing Shares to the Rights.

If a holder makes the election regarding basis allocation described in the response to Part II, Box 15, and we assume the holder has a tax basis of U.S. \$ 15.00 in an Existing Share, then the holder would allocate basis as follows (these numbers are supplied for illustrative purposes only):

Using the daily VWAP for each of the Existing Shares and the Rights, the Existing Shares would be allocated 95.3275% of the basis and the Rights would be allocated 4.6725% of the basis. These numbers were calculated by dividing the VWAP of the Existing Shares and Rights by their combined VWAPs (3.048 divided by 3.1974 and 0.1494 divided by 3.1974, respectively). Each Existing Share would therefore be apportioned \$14.30 of basis and each Right would be apportioned \$0.70 of basis, calculated by multiplying the respective percentages by a holder’s basis in an Existing Share at the time of the distribution (assumed to be \$ 15.00 in this example).

If a holder were instead to use the opening price for each of the Existing Shares and the Rights, the Existing Shares would be allocated 95.0776% of the basis and the Rights would be allocated 4.9224% of the basis. These numbers were calculated by dividing the opening price of the Existing Shares and Rights by their combined opening prices (3.187 divided by 3.352 and 0.1650 divided by 3.187, respectively). Each Existing Share would therefore be apportioned \$14.26 of basis and each Right would be apportioned \$0.74 of basis, calculated by multiplying the respective percentages by a holder’s basis in an Existing Share at the time of the distribution (assumed to be \$ 15.00 in this example).

Box 17. List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based.

The treatment of the distribution of Rights to holders of Existing Shares as a non-taxable distribution is based on section 305(a) and 305(d) of the Internal Revenue Code of 1986, as amended (the “Code”) and Treasury Regulations Section § 1.305-1. The tax basis calculations described above and elections with regard to such calculations are described in section 307 of the Code and Treasury Regulations Sections §§ 1.307-1 and 1.307-2.

Box 18. Can any resulting loss be recognized?

N/A.

Box 19. Provide any other information necessary to implement the adjustment, such as the reportable tax year.

For a holder whose taxable year is the calendar year, the reportable year is 2022.