

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 ▶ *H. Ruckstuhl* Date ▶ 11/15/2021
Print your name ▶ Holger Ruckstuhl Title ▶ Head Group Controlling & Tax
Christoph Ladner Title ▶ Head of Investor Relations

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 ▶			
Firm's address ▶	Phone no.			

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

**SULZER LTD.
EIN: 98-0109623**

Attachment to Internal Revenue Service Form 8937

The information herein is provided pursuant to Section 6045B of the Internal Revenue Code of 1986, as amended (the "Code"). The information herein does not constitute tax advice. Holders of common stock of Sulzer Ltd. ("Sulzer") are urged to consult their own tax advisors regarding the U.S. federal income tax consequences of the symmetrical demerger described below and their tax basis in their Sulzer common stock and common stock of medmix AG ("medmix") subsequent to such symmetrical demerger.

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.

In the symmetrical demerger, Sulzer shareholders received one share of medmix for every single Sulzer share held on September 29, 2021 after close of trading on SIX Swiss Exchange. On September 30, 2021, the shares of both Sulzer and medmix started trading separately on the SIX Swiss Exchange, and Sulzer intends to take the position that the Sulzer shareholders received the medmix shares on such date.

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.

Sulzer believes, and intends to take the position, that the symmetrical demerger described above should be treated as a tax-free transaction under Section 355 of the Code, and the discussion below assumes that the symmetrical demerger will be so treated.

A Sulzer shareholder's tax basis in the Sulzer common stock that it held immediately prior to the symmetrical demerger must be allocated between the Sulzer common stock and medmix common stock that it holds immediately following the symmetrical demerger in proportion to their relative fair market values at such time. There is no authority as to how to determine the fair market value of the Sulzer common stock and medmix common stock for this purpose. You should consult your tax advisor to determine the appropriate fair market values. One approach is to use the average of the high and low trading prices for Sulzer and medmix common stock on September 30, 2021, and that is the position that Sulzer has adopted for purposes of this Form 8937. Under this approach, each holder of Sulzer common stock would allocate (a) 67.46% of its basis in its Sulzer common stock immediately before the symmetrical demerger to the Sulzer common stock that it holds immediately after the symmetrical demerger and (b) 32.54% of its basis in its Sulzer common stock immediately before the symmetrical demerger to the medmix common stock that it holds immediately after the symmetrical demerger. This is based on (a) an average of the high and low trading value for Sulzer common stock on September 30, 2021 of 89.75 CHF and (b) an average of the high and low trading value for medmix common stock on September 30, 2021 of 43.3 CHF.

U.S. holders that acquired blocks of Sulzer common stock at different times or at different prices should consult their own tax advisors regarding the allocation of their aggregate adjusted tax basis among the medmix common stock received in the symmetrical demerger.

16. Describe the calculation of the change in basis and the data that support the calculation, such as the market values of securities and the valuation dates.

See the response to 15 above.

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

The tax treatment of the symmetrical demerger is based on Code Sections 355 and 358.

18. Can any resulting loss be recognized?

No.

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

The allocation of basis would be taken into account in the taxable year of the holder during which the symmetrical demerger occurred (e.g., 2021 of calendar year taxpayers).