

Mawson Infrastructure Group Inc
(EIN 88-0445167)
One for Six Reverse Stock Split of Common Stock
Attachment to Form 9937

Part II – Organizational Action

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.

On February 6, 2023 Mawson Infrastructure Group Inc (the "Company") filed a certificate of amendment to its certificate of incorporation with the Delaware Secretary of State to (i) effectuate a 1-for-6 reverse stock split of its outstanding common stock and (ii) reduce its authorized common stock to 90,000,000 shares. The reverse stock split took effect at the open of business on Thursday February 9, 2023. Pursuant to the reverse stock split, every six (6) shares of issued and outstanding common stock automatically converted into one (1) share of common stock. A shareholder who would have otherwise been entitled to a fractional share as a result of the reverse stock split received in lieu thereof one full share.

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.

Upon the effective date of the reverse stock split, every six (6) shares of common stock of the Company automatically converted into one (1) share of common stock. As a result, shareholders must allocate the aggregate tax basis in their shares held immediately prior to the reverse stock split among the shares held immediately after the reverse stock split. Shareholders that have acquired different blocks of common stock at different times or at different prices are urged to consult their own tax advisors regarding the allocation of their aggregated adjusted basis among, and the holding period of, that common stock.

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 answer to Line 15. While the basis "per share" is impacted, the basis of the shareholder's total investment remains unchanged. Shareholders with blocks of pre-split common stock not divisible by six (6) which reflect pre-split common stock acquired at different times or different prices must replicate such blocks of pre-split common stock in the post-split common stock received pursuant to a formula provided in Treasury regulations that seek to preserve, to the greatest extent possible the basis of a particular block of pre-split common stock in one of more post-split common stock shares received in exchange therefor. This may require the aggregate basis in one block of pre-split common stock to be allocated to post-split common stock in a manner where some post-split common stock blocks may have split basis and holding period segments.

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

IRC Sections 354(a), 358(a), 368(a) and 1001.

Line 18. Can any resulting loss be recognized?

The one (1) for six (6) reverse stock split is intended to be treated as a recapitalization for U.S. Federal income tax purposes. Therefore, a shareholder will not recognize any gain or loss for U.S. federal income tax purposes upon the combination of pre-reverse stock split shares into post-reverse stock split shares pursuant to the reverse stock split.

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

The reportable tax year in which the reverse stock split occurred is 2023.