



**Part II** Organizational Action *(continued)*

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

Blank lines for providing Internal Revenue Code section(s) and subsection(s).

18 Can any resulting loss be recognized? ▶ Please see attachment.

Blank lines for providing information regarding resulting loss recognition.

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

Blank lines for providing other information necessary to implement the adjustment.

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.

DocuSigned by: *Caroline Pontoppidan* DocuSigned by: *Patrick Jany* Date ▶ 4 June 2024

Print your name ▶ **Caroline Pontoppidan / Patrick Jany** Title ▶ **Chief Corporate Affairs Officer/ CFO**

<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.

**A.P. Møller - Mærsk A/S**  
**Attachment to IRS Form 8937**  
**Report of Organizational Actions Affecting Basis of Securities**

Part I, Question 10

A.P. Møller - MÆRSK A (DKK 1000): ISIN DK0010244425

A.P. Møller - MÆRSK B (DKK 1000): ISIN DK0010244508

A.P. Møller - MÆRSK A (DKK 500): ISIN DK0015996235

A.P. Møller - MÆRSK B (DKK 500): ISIN DK0015996318

Part II, Question 14

Pursuant to a demerger plan adopted on March 22, 2024 by A.P. Møller - Mærsk A/S (“Maersk”), a newly formed Danish company named Svitzer Group A/S (“ListCo”) was established, to which Maersk contributed 100% of the share capital of Svitzer A/S (including its subsidiaries), as well several tugboats and certain other assets and liabilities of Maersk directly related to the towage business (together, the “Contributed Assets”) in consideration for the allotment by ListCo of all of its Shares to Maersk’s shareholders in a transaction governed by Section 254 of the Danish Companies Act (the “Demerger”). For a complete description of the Demerger, please refer to the demerger plan published on Maersk’s website. Pursuant to the Demerger, each of Maersk’s shareholders received one share of ListCo for every share of Maersk with nominal value DKK 500 owned by such shareholder, and two shares of ListCo for every share of Maersk with nominal value DKK 1,000 owned by such shareholder. The first day of trading in ListCo’s shares was April 30, 2024. As a matter of Danish corporate law, the Contributed Assets were transferred to ListCo simultaneously with the issuance by ListCo of its shares directly to Maersk shareholders (such that ListCo had no outstanding shares prior to such issuance). Maersk believes that for U.S. federal income tax purposes it is appropriate to treat the Demerger as if Maersk contributed the Contributed Assets to ListCo in consideration for ListCo’s shares and then distributed all of ListCo’s shares to Maersk shareholders in a transaction that qualifies as a tax-free reorganization within the meaning of Sections 368(a)(1)(D) and 355 of the U.S. Internal Revenue Code. However, the Demerger was not structured to qualify as a non-taxable reorganization under the tax laws of the United States or any other jurisdiction (other than Denmark, where the Demerger was approved by the Danish tax authorities as a tax-free transaction). Accordingly, Maersk has not sought any opinion or ruling on the appropriate U.S. tax treatment of the Demerger. Maersk assumes no responsibility for any shareholder with respect to the information contained in this attachment and each Maersk shareholder that received ListCo shares pursuant to the Demerger should consult its own tax advisors regarding the tax treatment of the Demerger and any applicable tax consequences of receiving, holding or disposing of the ListCo shares based on its particular circumstances. The remainder of this form assumes that the treatment of the Demerger as a tax-free reorganization will be respected.

Part II, Question 15

Each Maersk shareholder must allocate its tax basis in each Maersk share held immediately prior to the Demerger between the ListCo shares received with respect to

that share pursuant to the Demerger and the Maersk shares held immediately after the Demerger, in proportion to their fair market values as of the date of the Demerger.

Part II, Question 16

The basis allocation described in Item 15 above is based on the relative fair market values of the Maersk shares and ListCo shares as of the date of the Demerger. Although U.S. federal income tax law does not specify how to determine such fair market values, one reasonable approach is to use the closing trading price quoted on the Nasdaq Copenhagen on April 30, 2024, which was the first trading day of ListCo's shares. On April 30, 2024, the ListCo shares' closing price was DKK 234.85. The Maersk shares' closing price was DKK 9,960.00 for Class A shares with nominal value of DKK 1,000, and DKK 10,190.00 for Class B shares with nominal value of DKK 1,000. Accordingly, under this methodology, approximately 4.503% of a shareholder's basis in Class A Maersk shares with nominal value of DKK 1,000 and 4.406% of a shareholder's basis in Class B Maersk shares with nominal value of DKK 1,000 owned immediately prior to the Demerger will be reallocated to such shareholder's basis in ListCo shares received in respect of such Maersk shares pursuant to the Demerger. Please note that each of Maersk's shareholders received one share of ListCo for every share of Maersk with nominal value DKK 500 owned by such shareholder, and two shares of ListCo for every share of Maersk with nominal value DKK 1,000 owned by such shareholder. Each Shareholder should consult its own tax advisor to determine the appropriate fair market values for purposes of the tax basis allocation rules and the general U.S. federal income tax consequences of the Demerger. Furthermore, the above allocation methodology is relevant for U.S. federal income tax purposes only. Other allocation methodologies may be required in other jurisdictions (including in Denmark, where the allocation for Danish tax purposes is based on the volume weighted average share prices during a 20-day period).

Part II, Question 17

Internal Revenue Code Sections 355, 358 and 368(a)(1)(D).

Part II, Question 18

Maersk shareholders should not recognize any loss on the Demerger for U.S. federal income tax purposes.

Part II, Question 19

The transactions constituting the Demerger should be reported in the shareholder's taxable year that includes April 30, 2024.

**The information contained herein provides a general summary regarding the application of certain provisions of the U.S. Internal Revenue Code that require a reduction by any Maersk shareholder that received ListCo shares pursuant to the Demerger of its tax basis in the Maersk shares. The information contained herein does not constitute tax advice and does not purport to describe all of the possible tax consequences of the Demerger or the tax consequences that may apply to any shareholder in its particular circumstances. Shareholders should consult their own**

**tax advisors with respect to the U.S. federal, state, local and non-U.S. tax consequences of the Demerger.**