

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 attached18 Can any resulting loss be recognized? ▶ See attached19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ See attachedSign
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 ▶

Karl Metcalf

Date ▶

10/31/2025

Print your name ▶

KARL METCALF

Title ▶

VP OF TAX

**Paid
Preparer
Use Only**

Print/Type preparer's name

Christopher W. Woll

Preparer's signature

Christopher W. Woll

Date

10/31/2025

Check ☐ if
self-employed

PTIN

P01327386

Firm's name ▶ KPMG LLP

Firm's EIN ▶

13-5565207

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

Phone no.

312-665-1000

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

Global Medical Response, Inc. (EIN: 20-1305023)
Attachment to Form 8937
Report of Organizational Actions Affecting Basis of Securities

Global Medical Response, Inc. (the “**Company**”) is providing the information contained herein pursuant to the requirements of section 6045B of the Internal Revenue Code of 1986, as amended (the “**Code**”). The discussion herein includes a general summary regarding the application of certain U.S. federal income tax laws and regulations to the debt described below and the potential effects on a debtholder’s adjusted U.S. tax basis resulting from such transactions.

The information contained herein does not constitute tax advice and does not purport to be complete or to describe the consequences that may apply to particular categories of debtholders. Debtholders are urged to consult their own tax advisors regarding the particular U.S. tax consequences of the transactions described herein and the impact to tax basis resulting from such transactions.

Unless otherwise specified herein, “**Section**” references are to the Code or Treasury regulations promulgated thereunder, each in effect as of the date hereof.

Part I:

Line 9. Classification and description.

- Existing term loan due October 31, 2028, with a total aggregate principal amount of approximately \$3,549,623,340 (the “**Existing Term Loan B**”).
- New term loan due October 1, 2032, with a total aggregate principal amount of approximately \$3,600,000,000 (the “**2032 Term Loan B**”).

Line 10. CUSIP number.

Instrument	CUSIP
Existing Term Loan B	00169QAG4
2032 Term Loan B	37956SAB0

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.

On or about September 19, 2025, the Company consummated the following transaction (the “**Debt-for-Debt Exchanges**”) with holders of a portion of the Existing Term Loan B (each an “**Exchange Holder**” and collectively, the “**Exchange Holders**”).

- Existing Term Loan B
 - The Exchange Holders exchanged Existing Term Loan B for an equal principal amount of the 2032 Term Loan B.

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.

Under U.S. federal income tax law, the exchange is expected to result in a debt-for-debt exchange of the Existing Term Loan B.

With respect to the Debt-for-Debt Exchange of the Existing Term Loan B for 2032 Term Loan B, under Section 1001 gain or loss may be realized by the Exchange Holders if such Debt-for-Debt Exchanges resulted in a “significant modification” of the Existing Term Loan B.

The Company believes, and the remainder of this discussion assumes, that the Debt-for-Debt Exchanges resulted in significant modifications of the Existing Term Loan B, under Treas. Reg. Section 1.1001-3.

Consequently, the Exchange Holders 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 Debt-for-Debt Exchanges.

The tax treatment of Debt-for-Debt Exchanges depends on whether they constitute recapitalizations under Section 368(a)(1)(E) (a “**Section 368(a)(1)(E) Recapitalization**”). The determination of whether the Debt-for-Debt Exchanges constitutes Section 368(a)(1)(E) Recapitalizations depends, *inter alia*, on whether each of Existing Term Loan B surrendered, and the 2032 Term Loan B received therefor, constitute “securities” for purposes of Section 354. Neither the Code nor the Treasury regulations define the term security. Whether a debt instrument is a security is based on all of the facts and circumstances, but most authorities have held that the term to maturity of the debt instrument is one of the most significant factors. In this regard, debt instruments with a term of ten years or more generally have qualified as securities, whereas debt instruments with a term of less than five years generally have not qualified as securities. Here, the debt instruments had the following terms to maturity:

- Existing Term Loan B: 3 years
- 2032 Term Loan B: 7 years

If the Existing Term Loan B and 2032 Term Loan B are determined to constitute securities for purposes of Section 354, and the respective exchanges of Existing Term Loan B for 2032 Term Loan B, otherwise qualify as Section 368(a)(1)(E) Recapitalizations, the Exchange Holders generally are expected not to recognize gain or loss with respect to the Debt-for-Debt Exchanges, except to the extent of cash or other “boot” received by the Exchange Holders as part of the Debt-for-Debt Exchanges (other than cash for accrued and unpaid interest). Specifically, an Exchange Holder is expected to be required to recognize gain on an exchange of Existing Term Loan B in an amount equal to the lesser of (1) the total gain realized by the Exchange Holder with

respect to such Existing Term Loan B, and (2) the amount of cash and fair market value of boot received, if any, for such Existing Term Loan B (other than cash for accrued and unpaid interest).

Here, the total gain realized by an Exchange Holder with respect to the Debt-for-Debt Exchanges is expected to equal the excess, if any, of (1) the sum of (a) the issue price of the 2032 Term Loan B and (b) the cash and fair market value of boot received, if any, over (2) the Exchange Holder's adjusted tax basis in the Existing Term Loan B. An Exchange Holder's adjusted tax basis in the 2032 Term Loan B is expected to be equal to the Exchange Holder's adjusted tax basis in the Existing Term Loan B exchanged, increased by the amount of any gain recognized on the Debt-for-Debt Exchanges and reduced by any cash (other than for accrued unpaid interest) and the fair market value of any boot received.

To the extent the Debt-for-Debt Exchanges do not qualify as Section 368(a)(1)(E) Recapitalizations, an Exchange Holder's aggregate initial tax basis in the 2032 Term Loan B generally is expected to be equal to the issue price of the 2032 Term Loan B.

Exchange Holders participating in the Debt-for-Debt Exchanges should consult their tax advisors to determine the U.S. federal income tax consequences to them of the Debt-for-Debt Exchanges.

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.

To the extent the Debt-for-Debt Exchanges are Section 368(a)(1)(E) Recapitalizations, an Exchange Holder's aggregate initial tax basis in the 2032 Term Loan B is expected to equal its aggregate adjusted tax basis in the Existing Term Loan B exchanged for the 2032 Term Loan B less the amount of cash and the fair market value of boot received (other than cash for accrued and unpaid interest), if any, plus the amount of any gain recognized.

To the extent the Debt-for-Debt Exchanges do not qualify as Section 368(a)(1)(E) Recapitalizations, an Exchange Holder's aggregate initial tax basis in the 2032 Term Loan B is expected to equal the issue price of the 2032 Term Loan B received in the Debt-for-Debt Exchanges.

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, 1273, and 1275.

Line 18. Can any resulting loss be recognized?

The Debt-for-Debt Exchanges generally should not result in loss being recognized by the Exchange Holders to the extent the exchanges are Section 368(a)(1)(E) Recapitalizations.

The Debt-for-Debt Exchanges may result in an Exchange Holder recognizing a loss to the extent the Debt-for-Debt Exchanges are treated as exchanges that are not Section 368(a)(1)(E) Recapitalizations and such Exchange Holder's tax basis in the Existing Term Loan B exchanged

exceeds the aggregate of the issue price of the 2032 Term Loan B, received plus the amount of cash and the fair market value of any boot received (other than cash for accrued and unpaid interest), if any, subject to generally applicable Code rules that may impact the ability of particular Exchange Holders to recognize losses.

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

The organizational actions occurred on September 19, 2025. The reportable tax year is 2025 for calendar-year taxpayers.