

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](#)

Horizontal lines for listing applicable Internal Revenue Code sections.

18 Can any resulting loss be recognized? ▶ [See attached](#)

Horizontal lines for providing information on loss recognition.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ [See attached](#)

Horizontal lines for providing other necessary information.

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:  Signature ▶ _____ Date ▶ 4/10/2026

Print your name ▶ **Chris Lovejoy** Title ▶ **Executive VP - General Tax Counsel**

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.

Paramount Skydance Corporation

EIN: 99-3917985

Attachment to Form 8937

Item 10 – CUSIP Number

PSKY 69932A204

Tax Basis Information Required Under Section 6045B of the Internal Revenue Code

Part II: ORGANIZATIONAL ACTION

CONSULT YOUR TAX ADVISOR

The information contained herein is being provided pursuant to the requirements of Section 6045B of the Internal Revenue Code of 1986, as amended (the "Code"), and includes a general summary regarding the application of certain U.S. federal income tax laws and regulations relating to the effects of the Merger (as defined below) on the tax basis of shares of common stock ("PSky Stock") of Paramount Skydance Corporation ("PSky") received in the Merger in exchange for shares of stock ("TFP Stock") of Runaway Media Inc. ("TFP"). 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 categories of stockholders. PSky does not provide tax advice to its stockholders. The information provided below is illustrative and is being provided pursuant to Section 6045B of the Code and as a convenience to stockholders and their tax advisors when determining their specific tax positions under their own specific facts. You are urged to consult your own tax advisor regarding the particular consequences of the Merger to you, including the applicability and effect of all U.S. federal, state and local and foreign tax laws.

Item 14 – Description of organizational action

Pursuant to the terms and conditions of the Merger Agreement entered into on October 6, 2025 by and between PSky and the other parties thereto (the "Merger Agreement"), (a) Hamilton Merger Sub I Inc. ("Merger Sub"), a direct wholly owned subsidiary of PSky merged with and into TFP (the "First Merger"), with TFP continuing as the surviving corporation in the First Merger (the "Surviving Corporation") and (b) immediately following the First Merger, the merger of the Surviving Corporation with and into Hamilton Merger Sub II LLC ("Merger Sub II"), a direct wholly owned subsidiary of PSky, (the "Second Merger," and, together with the

First Merger, the “Mergers”), with Merger Sub II continuing as the surviving entity in the Second Merger (the “Surviving Company”). Under the terms of the Merger Agreement, each common and preferred holder of TFP Stock was entitled to receive a proportional share of \$150 million of PSky common stock valued at \$15 per share, and \$80 million cash, before adjustments and leakage, which resulted in approximately 1.66 shares of PSky Stock and an amount of cash equal to \$13.29 (“Boot”) for each share of TFP common and preferred stock held immediately prior to the effective time of the Merger; provided that, if the aggregate number of shares of PSky Stock that a TFP stockholder was entitled to receive, included a fraction of a share of PSky Stock, cash was paid in lieu of any such fractional share. Upon closing the merger, TFP ceased to exist and the business operated by TFP is now operated through Hamilton Merger Sub II.

Item 15 -Description of the quantitative effect of the organization action on the basis of the security in the hands of the U.S. taxpayer as an adjustment per share or as a percentage of old stock basis:

The Merger was intended to qualify, and PSky will report the Merger, as a “reorganization” under Section 368(a) of the Code. Assuming the Merger so qualifies, no gain or loss will be recognized by TFP stockholder upon receipt of PSky Stock in exchange for TFP Stock, except that TFP stockholders will recognize gain or loss with respect to cash received in lieu of fractional shares of PSky.

In addition, for U.S. federal income tax purposes, a payment of Boot received in addition to the PSky Stock, could be recognized as gain but no loss is recognized to the extent basis in the TFP Stock exceeds the total value of PSky Stock and Boot received in the Merger.

For U.S. federal income tax purposes, the aggregate adjusted tax basis of the PSky Stock received by TFP stockholders should be the same as the aggregate adjusted tax basis of the TFP Stock exchanged for such PSky Stock in the Merger, adjusted in certain circumstances by Boot received. The actual tax basis should differ with respect to each separate TFP stockholder and, additionally, tax basis may differ with regard to separate blocks of shares owned by any TFP stockholder. The holding period of any shares of PSky Stock received by TFP stockholders in the Merger generally should include the holding period of the shares of TFP Stock exchanged for such shares of PSky Stock.

Item 16 - Description of the calculation of the change in basis and the data that supports the calculation:

The following is a description of how the previously described approach to basis determination would be applied:

Calculations:

- Step 1: *Determine the Tax Basis in TFP Stock.* Your tax basis generally should be equal to the amount you paid for your TFP Stock, as applicable, including commissions. If you acquired your TFP Stock as part of a compensation package, your tax basis generally equals the amount you paid for the stock (if any) plus any taxable income you recognized when you received or vested in the shares. If your basis is different for various shares of TFP Stock, separate your shares into blocks with the same basis for the Boot calculation in Step 3. If you received distributions from TFP in the past that were classified as return of capital, you should reduce your basis accordingly, but not below zero. Please consult your tax advisor.

- Step 2: *Calculate the Recognized Gain on Boot:* This calculation is performed on each block of stock separately, to the extent you have blocks of shares with different basis. If your TFP Stock has the same basis, then this can be calculated on the total. Total consideration should be allocated proportionally for each share of stock, then multiplied by the number of shares in each block. (a) Calculate the total consideration received in the Merger (or portion allocated to the block) which is the total value of stock + total Boot (*excluding payment for fractional shares*); (b) Calculate your realized gain by taking total consideration from (a) and deducting the total basis from Step 1 (or the total for the shares in that block); (c) If the result from (b) is a realized loss, then your recognized gain is \$0 (no loss is allowed), but if the result from (b) is a realized gain, then your recognized gain is the lesser of your realized gain or the Boot received.

- Step 3: *Calculate the Taxable Gain or Loss Recognized with Respect to any Disposed Fractional Share of PSky Stock.* Your gain or loss on the receipt of cash in lieu of any fractional share of PSky Stock equals (a) the cash you received in exchange for the disposed fractional share of PSky Stock, minus (b) your tax basis in such share of PSky Stock (as determined based on the calculation in Step 3).

- Step 4: *Calculate the Total Tax Basis in PSky Stock.* Your total tax basis in the PSky Stock, as applicable, received in the Merger (including any fractional share) in exchange for your TFP Stock depends on your recognized gain from Step 2. Calculate this on a block-by-block basis to the extent you calculated your recognized gain in Step 2 in the same manner. Your PSky tax basis equals your old TFP tax basis plus your recognized gain minus Boot received.

If you owned multiple blocks of TFP Stock purchased at different share prices, you should consult your tax advisor regarding your calculation of gain on the Boot received as well as the tax basis in the PSky Stock received in exchange for each such block.

Assumption for Example:

THE FOLLOWING EXAMPLE UTILIZES THE CALCULATIONS DESCRIBED ABOVE AND IS FOR ILLUSTRATIVE PURPOSES ONLY. In the example, it is assumed that you owned 999 shares of TFP stock at the time of the Merger. It is also assumed that 500 shares of the TFP stock have a \$100 basis and 499 shares have a \$5 basis.

In the example you would have been entitled to approximately 1,658.34 shares of PSky Stock valued at \$15 (999 shares of TFP stock times 1.66 stock exchange ratio) and a Boot payment of \$13,276.71 (999 shares of TFP stock times \$13.29). In exchange for the 0.34 fractional shares of PSky Stock, you would have received a cash payment of \$5.10 (\$15 times 0.34 fractional shares), leaving you with 1,658 shares of PSky Stock.

You should use your actual basis to complete the calculation as each shareholder basis is different. Please consult your tax advisor.

Example

Step 1: Determine Basis in TFP Stock

Block 1:	TFP 499 shares x \$5	\$2,495.00
Block 2:	TFP 500 shares x \$100	\$50,000.00

Step 2: Recognize Gain on Boot

Block 1:	Total Consideration	(499 x ((1.66x\$15)+\$13.29))	\$19,056.81
Block 1:	Less basis (Step 1)		- \$2,495.00
Block 1:	Realized Gain		<u>\$16,591.00</u>
Block 1:	Recognized Gain	(499 x \$13.29)	<u><u>\$6,631.71</u></u>
Block 2:	Total Consideration	(500 x ((1.66x\$15)+\$13.29))	\$19,095.00
Block 2:	Less basis (Step 1)		- \$50,000.00
Block 2:	Realized Gain		- \$30,905.
Block 2:	Recognized Gain	No loss recognition	<u><u>\$0</u></u>

Step 3: Calculate Gain/Loss on Fractional shares

Block 1:	Fractional shares sold: (TFP 499 x 1.66=828.34)	0.34 Fractional share x \$15 sale price	\$5.10
Block 1:	Less Basis	0.34 x (\$2,495 basis/828.34 PSky)	- -\$1..02
Block 1:	Fractional Share Gain/(Loss)		<u><u>\$4.08</u></u>
Block 1:	Remaining basis		<u>\$2,493.98</u>
Block 2:	TFP 500 x 1.66=830	No Fractional shares sold	\$0.00
Block 2:	Remaining basis		<u>\$50,000.00</u>

Step 4: Calculate PSky Tax Basis

Block 1:	828 PSky =TFP Basis – Boot + Gain	(2,493.98 - 6,631.71 + 6,631.71)	\$2,493.98
Block 2:	830 PSky	\$50,000 – (\$13.29x500) +\$0	<u>\$43,355.00</u>
Total:	PSky Share Aggregate Basis		<u><u>\$45,848.98</u></u>

In this example you would report a total taxable gain of \$6,635.79 (*block 1 plus block 2 recognized gain on Boot plus \$4.08 on fractional shares*), and you would have an aggregate tax basis of \$45,848.98 in the 1,658 PSky shares you received in the Merger.

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

The Merger between Paramount Skydance and The Free Press completed on October 6, 2025, is intended to qualify a reorganization within the meaning of Section 368(a) of the Code. In general, the income tax consequences to the TFP stockholders are determined under Sections 302, 354, 358, 1001, 1221 and 1223 of the Code.

Item 18 - Ability of any resulting loss to be recognized

TFP stockholders generally should not recognize any gain or loss for U.S. federal income tax purposes by reason of the Merger, except with respect to Boot and cash in lieu of a fractional share of PSky stock.

TFP stockholders who are U.S. Holders and who received both PSky Stock and Boot in the Merger (other than cash in lieu of a fractional share) generally should recognize gain (but not loss) with respect to such cash payment measured by the difference, if any, between the tax basis allocable to the share and the amount of cash received. TFP stockholders who received cash in lieu of a fractional share of PSky stock in the Merger, generally should recognize gain or loss with respect to such cash payment measured by the difference, if any, between the tax basis allocable to the share and the amount of cash received.

A non-U.S. Holder's gain in respect of any cash received (if any) should not be taxable in the United States, subject to certain exceptions not presented here. Please consult your tax advisor.

Item 19 - Provide any other information necessary to implement the adjustment

The Merger was completed on October 6, 2025, for U.S. federal income tax purposes. Accordingly, the reportable year for TFP stockholders is the tax year which includes October 6, 2025. For calendar year taxpayers, the reportable tax year is 2025.