

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ [IRC Sections 305\(a\) and 307\(a\)](#).

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 reportable tax year is the tax year that includes the date of the Distribution \(September 13, 2022\), which will generally be the 2022 calendar year for taxpayers that are on a calendar year for U.S. income tax purposes.](#)

[The information contained herein is being provided pursuant to the requirements of IRC Section 6045B. The laws of jurisdictions other than the United States may impose income taxes on stock dividends or have other rules for stock splits. We recommend all shareholders of PANW consult their own tax advisors regarding the particular consequences of the action reported herein.](#)

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
DocuSigned by:
Signature ▶ *Jeff Levenstam* Date ▶ 2022-10-05
Print your name ▶ Jeff Levenstam Title ▶ VP Tax

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|-------------------------------|----------------------------|----------------------|------|---|--------------|
| 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. |