





**Beacon Platform, Inc.**  
**(by acquiring entity Clearwater Analytics Holdings, Inc.)**  
**EIN: 81-1774783**  
**Attachment to Form 8937**  
**Report of Organizational Actions Affecting Basis of Securities**

**The information contained in the Form 8937 and this attachment 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 US federal income tax laws and regulations related to the effects of the mergers (each as discussed below). The information contained herein does not constitute tax advice and does not purport to be complete or describe the tax consequences that may apply to particular persons or categories of persons. Former shareholders of Beacon Platform, Inc. are encouraged to consult their independent tax advisors regarding the particular consequences of the mergers to them (including the applicability and effect of all federal, state, local and non-US laws).**

**Form 8937, Part II, Box 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 ►

The parties to the applicable corporate action include Clearwater Analytics Holdings, Inc., a Delaware corporation (“**Parent**”), Bluepoint Merger Sub I, Inc., a Delaware corporation and a direct, wholly owned Subsidiary of Parent (“**Merger Sub I**”), Bluepoint Merger Sub II, Inc., a Delaware corporation and a direct, wholly owned Subsidiary of Parent (“**Merger Sub II**”, and together with Merger Sub I, the “**Merger Subs**”), and Beacon Platform Incorporated, a Delaware corporation (the “**Company**”).

On April 30, 2025, in accordance with the Delaware General Corporation Law (“**DGCL**”), Merger Sub I was merged with and into the Company, the separate corporate existence of Merger Sub I ceased, and the Company continued as the surviving corporation and as a direct, wholly owned subsidiary of Parent. Subsequently on April 30, 2025, the Company merged with and into Merger Sub II, the separate corporate existence of the Company ceased, and Merger Sub II continued as the surviving corporation and as a direct, wholly owned Subsidiary of Parent.

At the respective effective times of each merger:

- (i) Each share of Company Common Stock that was issued and outstanding immediately prior to the mergers was cancelled, extinguished and converted automatically into the right to receive the per Share capital stock cash consideration (without interest thereon) and the per share capital stock consideration. The merger consideration was \$7.89 per Company Common Stock share, delivered in an approximately equal mix of cash and stock.
- (ii) Each share of Company Series A Preferred Stock that was issued and outstanding immediately prior to the mergers was cancelled, extinguished and converted automatically into the right to receive the Series A per share cash consideration and Series A per share stock consideration. The merger consideration was \$7.89 per Company Series A Preferred Stock share, delivered in an approximately equal mix of cash and stock.
- (iii) Each share of Company Series B Preferred Stock that was issued and outstanding immediately prior to the mergers was cancelled, extinguished and converted automatically into the right to receive the Series B per share cash consideration and Series A per share stock consideration. The merger consideration was \$7.89 per Company Series B Preferred Stock share, delivered in an approximately equal mix of cash and stock.
- (iv) Each share of Company Series C Preferred Stock that was issued and outstanding immediately prior to the mergers was cancelled, extinguished and converted automatically into the right to

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receive the Series B per share cash consideration and Series C per share stock consideration. The merger consideration was \$7.89 per Company Series C Preferred Stock share, delivered in an approximately equal mix of cash and stock.

**Form 8937, Part II, Box 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.

The mergers are intended to be treated as a forward subsidiary merger under Section 368(a)(2)(D). See Treas. Reg. 1.368-2(b)(1)(ii) Example 4,(b)(2); Rev. Rul. 2001-46. No ruling from the US Internal Revenue Service has been requested, and no such ruling is intended to be obtained, as to the US federal income tax consequences of the mergers.

The quantitative effect of the mergers on tax basis can vary amongst each of the Company's shareholders such that it cannot be expressed as a specific adjustment amount per share or as a percentage on the old basis.

Assuming the mergers together qualify as reorganization within the meaning of Section 368(a)(2)(D), the effect of the mergers on the Company's shareholders tax basis in the Clearwater Analytics Holdings, Inc. shares is expected to be determined primarily on whether the Company shares were exchanged for (i) cash consideration, or (ii) stock consideration. Company shareholders who received cash consideration are expected to be treated as having received payment for their Company shares, and, as these shareholders did not receive any Clearwater Analytics Holdings, Inc. shares, there is no new basis to compute.

**Form 8937, Part II, Box 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 ►

Generally, the Company's shareholders are expected to take a basis in the Clearwater Analytics Holdings, Inc. shares equal to the Company's shareholders' basis in their Company shares, decreased by any other property received (*e.g.*, money) and increased by any gain recognized by the Company's shareholders in the transaction under Section 358. The basis in the Clearwater Analytics Holdings, Inc. shares is expected to be computed on a by-share basis under Treas. Reg. 1.358-2.

Each of the Company's shareholders should consult their own tax advisors regarding their specific tax treatment of the reorganizations and the computation of their basis in the Parent Shares received in the transaction.

On the date the Merger was executed, Company shareholders generally received, per Company share, a mix of cash and stock consideration equal to \$7.89 per share. The total aggregate consideration of cash and Class A common stock of Clearwater Analytics Holdings Inc. was equal to \$529,949,210.

**Form 8937, Part II, Box 17.** List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ►

Section 368

Section 354

Section 356

Section 358

Section 1001

Section 1223

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**Form 8937, Part II, Box 18.** Can any resulting loss be recognized? ►

To the extent Company shareholders receive at least some Clearwater Analytics Holdings, Inc. shares in exchange for their shares of the company, such transaction is intended to be treated as a reorganization under Section 368(a)(2)(D) and no loss is expected to result. *See Form 8937, Part II, Box 14.* To the extent Company shareholders receive only cash for their Company shares that is less than their basis in the Company shares, such difference may generally be recognized as a loss for US federal income tax purposes. Such loss is computed on a share by share basis.

**Form 8937, Part II, Box 19.** Provide any other information necessary to implement the adjustment, such as the reportable tax year ►

The relevant date for purposes of determining tax basis and related information is April 30, 2025, the effective date of the mergers. Accordingly, the reportable tax year is the tax year that includes April 30, 2025, or, for calendar year taxpayers, the year ending on December 31, 2025.