Form **8937** (December 2017) Department of the Treasury Internal Revenue Service

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

OMB No. 1545-0123

Part I Reporting Issuer

1 Issuer's name IonQ, Inc. (successor to SkyWater Technology, Inc.)		2 Issuer's employer identification number (EIN) 85-2992192
3 Name of contact for additional information Laura McKenna	4 Telephone No. of contact	5 Email address of contact investors@ionq.co
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 4505 Campus Drive		7 City, town, or post office, state, and ZIP code of contact College Park, MD 20740
8 Date of action July 31, 2026	9 Classification and description Common stock of SkyWater Technology, Inc.	

10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)
83089J108		SKYT	

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

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 ▶ See attachment.

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 ▶ See attachment.

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 attachment.

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 attachment.

18 Can any resulting loss be recognized? ▶ See attachment.

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

Sign 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 ▶ Date ▶ 8/19/26

Print your name ▶ Laura McKenna Title ▶ VP tax

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check ☐ if self-employed	PTIN
	Firm's name ▶			Firm's EIN ▶	
	Firm's address ▶			Phone no.	

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

IonQ, Inc. (successor to SkyWater Technology, Inc.)

Attachment to Form 8937

Report of Organizational Actions Affecting Basis of Shares

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 U.S. federal income tax laws and regulations related to the effects of the Mergers (as defined 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 stockholders of SkyWater (as defined below) 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-U.S. laws).

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 July 31, 2026 (the "Closing Date"), IonQ, Inc., a Delaware corporation ("IonQ"), completed its acquisition of SkyWater Technology, Inc., a Delaware corporation ("SkyWater"), pursuant to the Agreement and Plan of Merger, dated as of January 25, 2026 (the "Merger Agreement"), by and among IonQ, Iris Merger Subsidiary 1 Inc., a Delaware corporation and a direct wholly owned subsidiary of IonQ ("Merger Subsidiary 1"), Iris Merger Subsidiary 2 LLC, a Delaware limited liability company and a direct wholly owned subsidiary of IonQ ("Merger Subsidiary 2"), and SkyWater.

Pursuant to the Merger Agreement: (i) at the Effective Time, Merger Subsidiary 1 merged with and into SkyWater, with SkyWater surviving as a direct wholly owned subsidiary of IonQ (the "First Merger"); and (ii) immediately following the Effective Time, and as part of the same plan, SkyWater, as the surviving entity of the First Merger, merged with and into Merger Subsidiary 2, with Merger Subsidiary 2 surviving under the name SkyWater Technology, LLC as a direct wholly owned subsidiary of IonQ (the "Second Merger" and, together with the First Merger, the "Mergers").

Upon the completion of the Mergers, under the terms of the Merger Agreement, SkyWater shareholders received (i) \$15.00 in cash (the "Per Share Cash Consideration") and (ii) 0.4883 shares of IonQ common stock (the "Per Share Stock Consideration" and, together with the Per Share Cash Consideration, the "Merger Consideration") for each share of SkyWater common stock held at close of the Mergers. No fractional shares of IonQ common stock were issued in the Mergers; each holder who would otherwise have been entitled to a fractional share received cash in lieu thereof.

The Parent Trading Price (as defined in the Merger Agreement) used for purposes of calculating the Per Share Stock Consideration was \$40.9543 per share of Parent Common Stock (as defined in the Merger Agreement). This agreed value was determined solely for the purposes of the Merger Agreement consideration mechanics and does not purport to represent the fair market value of Parent Common Stock.

Part II, 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 ►

In general, the Mergers, taken together, are intended to constitute an integrated plan described in Rev. Rul. 2001-46, 2001-2 C.B. 321, and to qualify as a "reorganization" within the meaning of Section 368(a) (the "Intended Tax Treatment"). In accordance with the Merger Agreement, IonQ and SkyWater determined that the Threshold Percentage (as defined in the Merger Agreement) was not less than 40%, and accordingly, that the Mergers qualified for the Intended Tax Treatment. Neither IonQ nor SkyWater intends to request a ruling from the Internal Revenue Service ("IRS") regarding the U.S. federal income tax consequences of the Mergers. Even if an opinion of counsel concludes that the Mergers qualify for the Intended Tax Treatment, no assurance can be given that the IRS will not challenge that conclusion or that a court would not sustain such a challenge. The remainder of this attachment assumes such qualification for the Intended Tax Treatment.

Holders of SkyWater common stock who are "United States persons" within the meaning of Section 7701(a)(30) of the Code ("U.S. Holders") will recognize gain (but not loss) in an amount equal to the lesser of (i) the amount by which the sum of the fair market value of the IonQ common stock and cash received by such U.S. Holder exceeds such U.S. Holder's tax basis in its SkyWater common stock, and (ii) the amount of cash received by such U.S. Holder (excluding for this purpose any cash received in lieu of fractional share interests in IonQ common stock). A U.S. Holder who receives cash instead of a fractional share of IonQ common stock generally will recognize capital gain or loss equal to the difference between the amount of cash received and the tax basis allocated to such fractional share of IonQ common stock.

A U.S. Holder will have an aggregate tax basis in the IonQ common stock received in the Mergers (including any fractional share interests in IonQ common stock deemed received and exchanged for cash) in an amount equal to the aggregate tax basis of the SkyWater common stock exchanged for the IonQ common stock, decreased by the amount of cash received in the Mergers (excluding for this purpose any cash received in lieu of fractional share interests in IonQ common stock), and increased by the amount of any gain recognized in the exchange (regardless of whether such gain is classified as capital gain or dividend income), excluding any gain recognized with respect to fractional share interests in IonQ common stock for which cash is received.

The holding period of IonQ common stock received in exchange for shares of SkyWater common stock (including any fractional share interests in IonQ common stock deemed received and exchanged for cash) will include the holding period of the SkyWater common stock exchanged for the IonQ common stock. If a U.S. Holder acquired different blocks of SkyWater common stock at different times or at different prices, such U.S. Holder's basis and holding period in its shares of SkyWater common stock may be determined separately with reference to each block of SkyWater common stock. Any such

U.S. Holder should consult its tax advisor regarding the determination of the tax basis and/or holding periods of the particular shares of IonQ common stock received in the Mergers.

Part II, 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 ►

There was no change in basis of the shares exchanged, except as noted on Part II, Line 15 (see above) with respect to the basis reduced by cash received by a U.S. Holder of SkyWater common stock in connection with the Mergers (including the Per Share Cash Consideration but excluding any cash received in lieu of fractional shares of IonQ common stock) and increased by the amount of gain (excluding any gain or loss resulting from the deemed redemption of fractional shares), if any, recognized by such U.S. Holder on the exchange.

Although U.S. federal income tax rules do not specify how to determine fair market value of any shares of IonQ common stock received, one possible approach is to utilize the Nasdaq Global Select Market closing price for IonQ common stock on the day of the closing of the Mergers on July 31, 2026, as an indication of fair market value. Using this approach, the fair market value of each share of IonQ common stock received in connection with the Mergers was $36.43. Other approaches to determine fair market value may also be possible, and former holders of SkyWater common stock should consult their tax advisors regarding the appropriate method for determining fair market value.

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

Sections 354(a), 356(a), 358(a)–(b), 368(a), 1001, 1221 and 1223.

Part II, Line 18. Can any resulting loss be recognized ►

A U.S. Holder of SkyWater common stock may recognize loss with respect to cash received in lieu of a fractional share of IonQ common stock, in connection with the Mergers as described on Part II, Line 14 (above). Such U.S. Holder generally will recognize capital loss with respect to such cash received, measured by the difference, if any, between the amount of cash received in lieu of a fractional share of IonQ common stock and the U.S. Holder's tax basis in the applicable share of SkyWater common stock (or portion thereof). Such capital loss will be long-term capital loss if the U.S. Holder's holding period in respect of such share of SkyWater common stock (or portion thereof) is greater than one year. The deductibility of capital losses is subject to limitations.

Part II, Line 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 July 31, 2026, the effective date of the Mergers. Accordingly, the reportable tax year is the tax year that includes July 31, 2026, or, for calendar year taxpayers, the year ending on

December 31, 2026. Former holders of SkyWater common stock are urged to consult their tax advisors with respect to their respective tax consequences of the Mergers.