

Crane Co.
Attachment to Form 8937, Report of Organizational Action Affecting Basis of Securities
Section 368(a)(1)(F) Reorganization of Crane Co.

Form 8937, Part II, Line 14

On December 2, 2021, Crane Co. (“Crane”) formed Crane Holdings, Co. (“Holdings”), a Delaware corporation, which in turn on December 2, 2021 formed Crane Transaction Company, LLC (“Merger Sub”). On May 16, 2022, Merger Sub merged with and into Crane, with Crane surviving as a wholly-owned subsidiary of Holdings (the “Crane Merger”). Following the Crane Merger, on May 16, 2022, Crane converted from a Delaware corporation into a Delaware limited liability company named “Crane LLC” (the “Crane Conversion” taken together with the Crane Merger, the “Reorganization”).

Pursuant to the Crane Merger, each share of Crane common stock owned by each shareholder was converted into a share of Holdings common stock on a one-for-one basis, having the same rights and preferences, and qualifications, limitations, and restrictions as the common stock in Crane previously owned by each shareholder. As a result, shareholders of Crane automatically became shareholders of Holdings, holding the same number of shares of Holdings common stock as they held of Crane common stock as of immediately prior to the Reorganization.

Form 8937, Part II, Line 15

The Crane Merger and Crane Conversion, taken together, are intended to qualify as a tax-free reorganization within the meaning of Section 368(a)(1)(F) of the Internal Revenue Code of 1986, as amended.

With respect to holders of Crane common stock, for U.S. federal income tax purposes, the aggregate tax basis of the Holdings common stock received by each holder is expected to be equal to the aggregate tax basis such holder had in Crane common stock immediately prior to the Crane Merger.

The holding period for the shares of Holdings stock received is expected to include the holding period for the Crane shares surrendered in the Reorganization.

Holders should consult their own tax advisors regarding the tax consequences of the Reorganization.

Form 8937, Part II, Line 16

As the Reorganization was effected on a one-for-one basis, a holder’s basis in each Holdings share received in the Reorganization is expected to be the same as the basis in each Crane share held immediately before the Reorganization.

Holders should consult their own tax advisors regarding the tax consequences of the Reorganization.

Form 8937, Part II, Line 17

Sections 354, 358, 368 and 1223.

Form 8937, Part II, Line 18

The Reorganization is not expected to result in a recognizable loss to the holders of Crane common stock.

Holders should consult their own tax advisors regarding the tax consequences of the Reorganization.

Form 8937, Part II, Line 19

Not applicable