



**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.

Blank lines for listing applicable Internal Revenue Code sections.

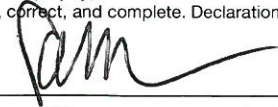
18 Can any resulting loss be recognized? ▶ See attachment.

Blank lines for providing information regarding loss recognition.

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

Blank 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.

Sign Here  
Signature ▶  Date ▶ 4/13/23  
Print your name ▶ RICHARD MAUE Title ▶ EPC CFO

<b>Paid Preparer Use Only</b>	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.

**Crane Holdings, Co.**

**Attachment to Form 8937**

**Distribution of Crane Company Common Stock**

The information in this attachment represents the general understanding of Crane Holdings, Co. (“Holdings”) as to the application of certain existing U.S. federal income tax laws and regulations relating to the Distribution (as defined below). It does not constitute tax advice and does not purport to be complete or to describe the consequences that may apply to particular categories of shareholders. You are urged to consult your own tax advisor regarding the particular consequences of the Distribution to you, including the applicability and effect of all U.S. federal, state and local and foreign tax laws.

**Part I**

**Line 12 – Ticker symbol**

Holdings common stock traded under the ticker symbol “CR” prior to the Distribution (as defined below). Following the Distribution, Holdings will be renamed “Crane NXT, Co.” and intends for its common stock to continue to trade on the NYSE under a new ticker symbol, “CXT.” Crane Company will trade under the ticker symbol “CR” following the Distribution.

**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 April 3, 2023, Holdings distributed 100% of the outstanding shares of Crane Company’s common stock to holders of Holdings common stock (the “Distribution”). Each holder of Holdings common stock received one share of Crane Company common stock for every one share of Holdings common stock held as of the record date, March 23, 2023. No fractional shares of Crane Company common stock were issued.

**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.**

The aggregate tax basis of a U.S. taxpayer’s shares of Holdings common stock held prior to the Distribution must be allocated between (i) the Holdings common stock the U.S. taxpayer continued to hold immediately following the Distribution, and (ii) the Crane Company common stock the U.S. taxpayer received in the Distribution, in proportion to their relative fair market values. Stockholders that acquired Holdings common stock at different times or different prices must calculate their basis in each block of stock and then allocate a portion of that tax basis to the Holdings common stock and the Crane Company common stock received with respect thereto.

Stockholders that have acquired different blocks of Holdings common stock at different times or at different prices should consult their tax advisors regarding the allocation of their aggregate adjusted basis among the Crane Company shares distributed with respect to blocks of Holdings common stock.

**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.**

As described in Line 15 above, U.S. federal income tax laws provide that Holdings stockholders will be required to allocate the aggregate tax basis in their Holdings common stock held immediately before the Distribution between the Crane Company common stock received in the Distribution and their Holdings common stock held immediately after the Distribution based on the relative fair market values of each. The tax laws do not, however, specifically prescribe how to determine the fair market values of the Holdings common stock and the Crane Company common stock for purposes of allocating tax basis.

There are several possible methods for determining the fair market values of Holdings common stock and Crane Company common stock. One possible approach is to utilize the closing price on the first day of trading after the Distribution. The closing prices on April 4, 2023 for Holdings common stock was \$40.82 per share and for Crane Company common stock was \$79.00 per share. Based on that approach, 34.068% of a Holdings shareholder's aggregate tax basis in his or her shares of Holdings common stock immediately prior to the Distribution would be allocated to such shareholder's shares of Holdings common stock following the Distribution, and 65.932% of a Holdings shareholder's aggregate tax basis in his or her shares of Holdings common stock immediately prior to the Distribution would be allocated to such shareholder's shares of Crane Company common stock received in the Distribution.

Other approaches to determine fair market value may also be possible, such as using the average of the high and low trading prices on the first day of trading after the Distribution. Stockholders are not bound by the approaches mentioned above and may, in consultation with their own tax advisor, use another approach in determining fair market values for purposes of allocating tax basis.

**Line 17 – List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based.**

Section 355; Section 358; Section 368

**Line 18 – Can any resulting loss be recognized?**

Generally, Holdings shareholders will not recognize any gain or loss as a result of the Distribution.

**Line 19 – Provide any other information necessary to implement the adjustment, such as the reportable tax year.**

The Distribution occurred on April 3, 2023. As a result, the basis adjustments in the shares of Holdings common stock and Crane Company common stock should be calculated in the taxable year that includes this date.

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