# 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

				**	
	art I Reporting	Issuer			
1	Issuer's name				2 Issuer's employer identification number (EIN)
Exide Technologies					23-0552730
	Name of contact for ad	ditional information	4 Telephor	e No. of contact	5 Email address of contact
Stephanie Zedell 678-566-9128					stephanie.zedell@na.exide.com
6	Number and street (or F	P.O. box if mail is not	delivered to	street address) of contact	7 City, town, or post office, state, and ZIP code of contact
130	000 Deerfield Parkway,	Building 200			Milton, GA 30004
8 Date of action 9 Classification and description					
-	31/2019			Lien Note Exchange	
10	CUSIP number	11 Serial number	s)	12 Ticker symbol	13 Account number(s)
D	See attached art II Organization	anal Action Attac	sh additions	l atatamanta if paadad	See back of form for additional questions.
14					date against which shareholders' ownership is measured for
17	the action ► See atta		ipplicable, tric	date of the action of the	date against which shareholders ownership is measured for
	See all	acried			
-					
10					
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 adjustn					
	share or as a percenta	age of old basis ► Se	ee attached		
16	Describe the calculation		asis and the	data that supports the calc	sulation, such as the market values of securities and the
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Par	tШ	Organizational Action (continued)	
17	List th		See attached
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8			
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18	Can ar	ny resulting loss be recognized? ► See attached	
-			
-			
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19	Provid	de any other information necessary to implement the adjustment, such as the reportable tax year ▶ N/A	
-			
-			
-	Line	der penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and	to the best of my knowledge and
	belie	ief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer h	as any knowledge.
Sign	.	A = 0	1-
Here		nature ► / 165 Date ► 115	120
	Oigi	Charles Tedell VPT	621
-		nt your name ► Title ► Title ► Preparer's name Preparer's signature Date Out	PTIN
Paid		Che	eck if FIIN -employed
	oarer		n's EIN ▶
Use	Only	V	n's EIN ▶ ne no.
Sond	Form 0	Firm's address ► Pho 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden,	
Octio	E OHITE C	findicing accompanying statements) to, bepartment of the freastry, internal nevenue service, Ogden,	_ , _ , , _ , _ , _ ,

# Exide Technologies FEIN: 23-0552730

### Attachment to Form 8937

# **Report of Organizational Actions Affecting Basis of Securities**

7.25% 1.5 Lien Senior Secured Convertible Notes due 2027

Disclaimer: The information contained in Form 8937 and this attachment does not constitute tax advice and does not purport to take into account any note holder's specific circumstances. Note holders are urged to consult their own tax advisors regarding the U.S. tax consequences of the transaction described herein and the impact to tax basis resulting from the transaction.

# Exide Technologies FEIN: 23-0552730

# Attachment to Form 8937

# Report of Organizational Actions Affecting Basis of Securities 7.25% 1.5 Lien Senior Secured Convertible Notes due 2027

# Form 8937, Part I, Line 10

## 7.25% 1.5 Lien Senior Secured Convertible Notes due 2027

- CUSIP 302051BE6
- CUSIP 302051BF3
- CUSIP U3003PAL6

### Form 8937, Part II, Line 14

On December 31, 2019, Exide Technologies ("Exide") issued 68.95 million shares of Exide common stock in exchange for \$301.7 million aggregate principal amount of its outstanding 7.25% 1.5 Lien Senior Secured Convertible Notes due 2027 (the "1.5 Lien Notes") (or .22858 shares of Exide common stock per \$1 principal amount of 1.5 Lien Notes).

Holders of 1.5 Lien Notes ("Holders") who exchanged their 1.5 Lien Notes for Exide common stock should consult their tax advisors to determine their tax consequences resulting from such exchange.

### Form 8937, Part II, Line 15

To the extent that the 1.5 Lien Notes constituted "securities" for purposes of the rules providing for tax-free recapitalizations ("Tax Securities"), each Holder's aggregate tax basis in the Exide common stock received will generally equal the Holder's aggregate tax basis in the 1.5 Lien Notes that were surrendered (excluding any amounts attributable to accrued interest), increased by any gain recognized and decreased by any boot received.

To the extent that the 1.5 Lien Notes did not constitute Tax Securities, each Holder will recognize gain or loss upon the receipt of Exide common stock. In that event, the Holder's tax basis in its 1.5 Lien Notes will be extinguished and the Holder's tax basis in the Exide common stock will be its fair market value on the date of receipt.

## Form 8937, Part II, Line 16

To the extent that the 1.5 Lien Notes constituted Tax Securities, a Holder's aggregate tax basis in the Exide common stock will generally equal such Holder's aggregate tax basis in the 1.5 Lien Notes that were surrendered in the exchange (excluding any amounts attributable to accrued interest).

To the extent that the 1.5 Lien Notes did not constitute Tax Securities, a Holder's tax basis in the Exide common stock received will be its fair market value on the date of receipt.

### Form 8937, Part II, Line 17

Sections 354, 356, 358, 1001 and 1012.

### Form 8937, Part II, Line 18

The exchange of 1.5 Lien Notes for Exide common stock generally should not result in a recognizable loss to Holders to the extent the 1.5 Lien Notes constituted Tax Securities. To the extent the 1.5 Lien Notes did not constitute Tax Securities, the exchange may result in a recognizable loss to Holders to the extent a Holder's tax basis in the 1.5 Lien Notes exceeded the fair market value of the Exide common stock exchanged therefor.