

Report of Organizational Actions Affecting Basis of Securities

OMB No. 1545-0123

► See separate instructions.

Part I Reporting Issuer

1 Issuer's name <u>Holcim Ltd</u>		2 Issuer's employer identification number (EIN)	
3 Name of contact for additional information <u>Unternaehrer Markus</u>	4 Telephone No. of contact <u>+41 (0) 58 858 87 87</u>	5 Email address of contact <u>investor.relations@holcim.com</u>	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact <u>Grafenauweg 10</u>		7 City, town, or post office, state, and ZIP code of contact <u>6300 Zug, Switzerland</u>	
8 Date of action <u>June 23, 2025</u>		9 Classification and description <u>Amrize Ltd ordinary shares - Spin-off</u>	
10 CUSIP number <u>n.a.</u>	11 Serial number(s) <u>n.a.</u>	12 Ticker symbol <u>HOLN</u>	13 Account number(s) <u>n.a.</u>

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 ► 29 July 2025

Print your name ► Markus Unternaehrer Reto Gaechter Title ► Head Tax, Head Swiss Tax & Financing

**Paid
Preparer
Use Only**

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.			

Holcim Ltd

Distribution of Amrize Ltd Ordinary Shares

ATTACHMENT TO FORM 8937

REPORT OF ORGANIZATIONAL ACTIONS AFFECTING BASIS OF SECURITIES

CONSULT YOUR TAX ADVISOR

The information contained herein is being provided pursuant to the requirements of Section 6045B of the Internal Revenue Code of 1986, as amended (the “Code”). This attachment includes a general summary regarding certain U.S. federal income tax laws and regulations relating to the effects of the Distribution (as defined below) on the tax basis of the ordinary shares of Holcim Ltd (“Holcim”), and the allocation of tax basis among ordinary shares of Holcim and ordinary shares of Amrize Ltd (“Amrize”) following the Distribution. The information contained herein 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. Neither Holcim nor Amrize provides tax advice to its shareholders. The example provided below is illustrative and is being provided pursuant to Section 6045B of the Code as a convenience to shareholders and their tax advisors when establishing their specific tax position. You are urged to consult your tax advisors regarding the particular consequences of the Distribution to you, including the applicability and effect of all U.S. federal, state, and local tax laws and foreign tax laws. We urge you to read the Information Statement, dated and filed with the Securities and Exchange Commission on May 7, 2025 noting especially the discussion therein under the heading “Material U.S. Federal Income Tax Consequences of the Distribution” and “Material U.S. Federal Income Tax Consequences of the Ownership of Company Shares”. You may access the Information Statement at www.sec.gov.

This information does not apply to ordinary shares of Holcim sold, exchanged, or otherwise disposed of prior to 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 June 23, 2025, Holcim distributed to holders of Holcim ordinary shares, on a pro rata basis, one hundred percent of the outstanding Amrize ordinary shares (the “**Distribution**”). Each Holcim shareholder received one Amrize ordinary share for each Holcim ordinary share held on June 20, 2025, the record date for the Distribution. The Distribution, together with certain internal reorganization transactions undertaken in anticipation of the Distribution, are intended to qualify as a tax-free transaction under Section 355, Section 368(a)(1)(D) and related provisions of the Code.

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.

As a result of the Distribution, Holcim shareholders will be required to allocate the aggregate tax basis in their Holcim ordinary shares held immediately prior to the Distribution between (i) the Holcim ordinary shares held immediately following the Distribution and (ii) the Amrize ordinary shares received in the Distribution. This allocation is made in proportion to the relative fair market values of Holcim ordinary shares and Amrize ordinary shares. Shareholders that acquired Holcim ordinary shares at different times or different prices will need to separately calculate their tax basis in each block of Holcim ordinary shares and then allocate a portion of that tax basis to the Amrize ordinary shares received with respect to such Holcim ordinary shares. Such shareholders should consult their tax advisors regarding the allocation of the aggregate tax basis in their Holcim ordinary shares among their Holcim ordinary shares and the Amrize ordinary shares received in the Distribution.

Line 16 — Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of the securities and the valuation dates.

U.S. federal income tax laws do not specifically identify how to determine the fair market values of the Holcim ordinary shares or the Amrize ordinary shares. One method for determining the fair market values is to use the average of the high and low trading prices of the Holcim ordinary shares and the Amrize ordinary shares on June 24, 2025, the first trading day after the Distribution. Using this method, the fair market value of a Holcim ordinary share on June 24, 2025 was \$71.34 and the fair market value of an Amrize ordinary share on June 24, 2025 was \$53.48. Based on these fair market values and the distribution ratio of one Amrize ordinary share per Holcim ordinary share held, shareholders' pre-Distribution tax basis should be apportioned 57.15% to their Holcim ordinary shares and 42.85% to their Amrize ordinary shares.

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

The applicable Internal Revenue Code sections upon which the tax treatment is based are sections 355, 358, 361 and 368.

Line 18 — Can any resulting loss be recognized?

Holcim intends for the Distribution, together with certain internal reorganization transactions undertaken in anticipation of the Distribution, are intended to qualify as a tax-free transaction under Section 355, Section 368(a)(1)(D) and related provisions of the Code. Assuming that this characterization is respected, Holcim shareholders generally will not recognize any loss on the Distribution for U.S. federal income tax purposes.

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

The Distribution occurred on June 23, 2025. As a result, the basis adjustments in the Holcim ordinary shares and Amrize ordinary shares should be reported in the taxable year that includes this date. In the case of shareholders who are calendar year taxpayers, the Distribution is reportable in the tax year ending December 31, 2025.