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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	2 Issuer's employer identification number (EIN)
Inspire Semiconductor Holdings Inc.	98-1725921

3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact
Jack Cartwright, CFO	303-619-8103	jcartwright@inspiresemi.com

6 Number and street (or 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
5301 Southwest Parkway, Building 1, Suite 100	Austin, TX 78735

8 Date of action	9 Classification and description
October 8, 2026	Common stock, $0.001 par value (formerly SVS and PVS)

10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)
457795102	N/A	None (fmr. INSP / INSSF)	N/A

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 ▶ On October 8, 2026, Inspire Semiconductor Holdings Inc. (the "Company") completed a plan of arrangement under the Business Corporations Act (British Columbia) (the "Arrangement"). Each Proportionate Voting Share ("PVS") was converted into 100 Subordinate Voting Shares ("SVS"), and the Company then continued out of British Columbia and domesticated in Delaware, with each SVS becoming one share of common stock, par value $0.001. Shares of a dissenting shareholder were cancelled in exchange for the right to be paid fair value and did not participate. The Company is treated as a U.S. domestic corporation under Section 7874(b) both before and after the Arrangement. See attached statement.

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 Company intends the continuance to qualify as a reorganization under Section 368(a)(1)(F), with the PVS conversion treated as a step in that reorganization (or, alternatively, as a recapitalization under Section 368(a)(1)(E) or an exchange under Section 1036). A holder's aggregate tax basis in the common stock received equals its aggregate tax basis in the SVS and PVS surrendered. Former SVS holders: basis per share is unchanged. Former PVS holders: the basis of each share of common stock equals 1/100 of the basis of the PVS from which it was converted. The holding period of the common stock includes the holding period of the shares surrendered. See attached statement.

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 ▶ No change in aggregate basis results from the Arrangement. Per-share basis changes only for former PVS holders, whose basis in each PVS is allocated equally across the 100 shares of common stock received for it. No fair market value determination is required. See attached statement.

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Part II Organizational Action *(continued)*

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ **Sections 354, 358, 368(a)(1)(E), 368(a)(1)(F), 1036, 1223(1) and 7874(b) of the Internal Revenue Code.**

18 Can any resulting loss be recognized? ▶ **No. No loss may be recognized by a holder on the PVS conversion or the continuance. A holder who exercised dissent rights and receives a payment for its shares should consult its own tax advisor.**

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ **The reportable tax year is the holder's taxable year that includes October 8, 2026 (calendar year 2026 for calendar-year holders). The Company has not sought a ruling from the IRS or an opinion of counsel on the treatment described. See attached statement.**

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 ▶ Signed by: Jack Cartwright 19F2086D42F347C... Date ▶ 11/16/2026

Print your name ▶ **Jack Cartwright** Title ▶ **Chief Financial Officer**

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

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Inspire Semiconductor Holdings Inc.

Attachment to Form 8937, Report of Organizational Actions Affecting Basis of Securities

EIN 98-1725921

The information below is provided under Section 6045B of the Internal Revenue Code of 1986, as amended (the "Code"), and is a general summary only. It does not address the circumstances of any particular holder and is not tax advice. Holders should consult their own tax advisors.

Line 14 – Organizational action

On October 8, 2026 (the "Effective Date"), Inspire Semiconductor Holdings Inc. (the "Company") completed a plan of arrangement under the Business Corporations Act (British Columbia) (the "Arrangement"). Under the Arrangement:

1. each Proportionate Voting Share ("PVS") was converted into 100 Subordinate Voting Shares ("SVS") (the "Mandatory Conversion"); and
2. the Company continued out of British Columbia and domesticated in the State of Delaware (the "Continuance"), and each outstanding SVS, including each SVS issued in the Mandatory Conversion, became one share of common stock, par value $0.001, of the Company as a Delaware corporation (CUSIP 457795102; former SVS CUSIP 457777100).

Shares held by a shareholder who exercised dissent rights were transferred to the Company and cancelled at the effective time of the Arrangement in exchange for the right to be paid fair value, and did not take part in the Mandatory Conversion or the Continuance.

Both before and after the Arrangement, the Company has taken the position that it is treated as a U.S. domestic corporation for U.S. federal income tax purposes under Section 7874(b) of the Code.

Line 15 – Quantitative effect on basis

The Company intends the Continuance to qualify as a reorganization under Section 368(a)(1)(F) of the Code, and the Mandatory Conversion to be treated as a step in that reorganization or, alternatively, as a recapitalization under Section 368(a)(1)(E) or an exchange under Section 1036 of the Code. On that basis:

- A holder's aggregate tax basis in the common stock received equals the holder's aggregate tax basis in the SVS and PVS surrendered.
- For former SVS holders, the basis of each share of common stock equals the basis of the corresponding SVS.
- For former PVS holders, the basis of each share of common stock equals 1/100 of the basis of the PVS from which it was converted.
- The holding period of the common stock includes the holding period of the SVS or PVS surrendered.

Line 16 – Calculation of the change in basis

No change in aggregate basis results from the Arrangement. Per-share basis changes only for former PVS holders, whose basis in each PVS is allocated equally across the 100 shares of common stock received for it. No fair market value determination is required.

Line 17 – Applicable Code sections

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Sections 354, 358, 368(a)(1)(E), 368(a)(1)(F), 1036, 1223(1) and 7874(b) of the Code.

Line 18 – Recognition of loss

No loss may be recognized by a holder on the Mandatory Conversion or the Continuance. A holder who exercised dissent rights and receives a payment for its shares should consult its own tax advisor.

Line 19 – Other information

The reportable tax year is the holder's taxable year that includes October 8, 2026 (calendar year 2026 for calendar-year holders). The Company has not sought a ruling from the Internal Revenue Service or an opinion of counsel on the treatment described above.