Information regarding dividend for US Tax subjects

The attached Form 8937 is required by US tax authorities to be published on the website in relation to the distribution in May 2023 of additional shares with no cash option to all shareholders.

This form is intended to notify recipients who are subject to US tax that such a distribution is not included in gross income for US federal tax purposes and that the basis of shares with respect to which the distribution was made must be allocated between the old and new shares in proportion to the fair market values of each on the date of distribution.

Distribution recipients should consult their tax advisors with respect to the US tax implications of the distribution reported on Form 8937.
Koninklijke Philips NV (hereinafter "Philips") declared a dividend of Eur 0.85 per share which was payable on May 18, 2023, for shares held on May 12, 2023. The dividend was issued as a stock dividend (dividend in shares) to shareholders of Philips common stock (including holders of Philips ADR shares). The exchange ratio (after withholding tax deduction) is 1 to 2.3906 existing shares owned.

The May 12, 2023 dividend referred to in Line 14 was made with respect to all issued and outstanding common shares of Koninklijke Philips NV and is expected to be treated as a distribution pursuant to Section 305(a) of the United States Internal Revenue Code (IRC), Title 26 of the United States Code. United States Treasury Regulations issued pursuant to Section 307 of the IRC indicate that "If a shareholder receives stock or stock rights as a distribution on stock previously held and under Section 305 such distribution is not includible in gross income then, except as provided in Section 307(b) and Treas. Reg. Section 1.307-2, the basis of the stock with respect to which the distribution was made shall be allocated between the old and new stocks or rights in proportion to the fair market values of each on the date of distribution."

For illustrative purposes only - if prior to the share distribution a shareholder held 100 shares of Philips common stock, with each having a basis of $20, and the shareholder received an additional 5 common shares of Philips stock pursuant to the stock distribution, then (assuming the distribution was pursuant to Section 305(a)), each of the total 105 shares held by the shareholder following the distribution would be anticipated to have a basis of $19.05.

See also #15 above.
17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ➤ IRC Section 305 and IRC Section 307

18 Can any resulting loss be recognized? ➤ The organizational action described in Line 14 is not expected, in itself, to cause a loss to the recipients.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ➤ The share distribution was for the shareholder's taxable year that includes the date of the share distribution.

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 ➤ Maurice Kuiper
Date ➤ 15 March 2024

Print your name ➤ Maurice Kuiper
Title ➤ Head of Tax

Paid Preparer
Use Only

Firm’s name ➤
Firm’s address ➤

Check ☐ if self-employed

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054