

Report of Organizational Actions Affecting Basis of Securities

OMB No. 1545-0123

► See separate instructions.

Part I	Reporting Issuer
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1 Issuer's name		2 Issuer's employer identification number (EIN)	
MODEX THERAPEUTICS, INC.		85-3416039	
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact	
ADAM LOGAL	(305) 575-4100	ALOGAL@OPKO.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	
4400 BISCAYNE BLVD		MIAMI, FL 33137	
8 Date of action		9 Classification and description	
MAY 9, 2022		COMMON STOCK	
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)

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 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 ► SEE 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 ► SEE STATEMENT

Part II **Organizational Action** (continued)**17** List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ►**IRC SECTION 354, 361, 368****18** Can any resulting loss be recognized? ► **SEE STATEMENT****19** Provide any other information necessary to implement the adjustment, such as the reportable tax year ► **SEE 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 ►

Date ►

6/23/22

Print your name ► **ADAM LOGAL**Title ► **CFO****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.

OPKO Health, Inc.
EIN 75-2402409
Attachment to Form 8937
Report of Organizational Action Affecting Basis of Securities

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

Line 14, Description of Organizational Action:

On May 9, 2022, OPKO Health, Inc., acquired 100% of the outstanding shares of ModeX Therapeutics, Inc. ("ModeX"), in a transaction intended to qualify for tax-free treatment under Section 368 and 1032.

Line 15, Quantitative Effect:

The former shareholders of ModeX recognized substituted carryover basis to the extent of OPKO Health, Inc. shares received in consideration. OPKO Health, Inc. paid \$219,373,836 in OPKO Health, Inc. shares (or \$2.44 per share to each ModeX shareholder – total OPKO Health shares issued to the former ModeX shareholders were 89,907,310).

Line 16, Calculation of Change of Basis:

OPKO Health, Inc. paid an aggregate of \$219,373,836 in OPKO Health Inc shares (or \$2.44 per share) to former ModeX shareholders. Each of ModeX's shareholders would determine gain based on the provisions of IRC Section 354.

Line 18, Recognition of Loss:

No.

Line 19, Other Information:

The Transaction closed on May 9, 2022.