

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.](#)

Blank lines for listing applicable Internal Revenue Code sections.

18 Can any resulting loss be recognized? ▶ [See attachment.](#)

Blank lines for providing information regarding resulting loss recognition.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ [See attachment.](#)

Blank lines for providing other necessary information for the adjustment.

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.

Sign Here
Signature ▶  Date ▶ August 11, 2025

Print your name ▶ **Jennifer K. Bowers** Title ▶ **VP Tax**

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.

Fortive Corporation
EIN: 47-5654583
Attachment to Form 8937

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 shares of Fortive Corporation (“Fortive”) common stock (NYSE: FTV), and the allocation of tax basis between shares of Fortive common stock and shares of Ralliant Corporation (“Ralliant”) common stock (NYSE: RAL) pursuant to the Distribution.

DISCLAIMER: The information provided on Form 8937 and within this attachment is based on the intended tax treatment of the Distribution as a distribution pursuant to Section 355 and does not constitute tax advice and does not purport to be complete or to describe the consequences that may apply to particular categories of stockholders. Neither Fortive nor Ralliant provides tax advice to its stockholders and the example provided below is merely illustrative. Stockholders, including stockholders that hold different blocks of shares (i.e., shares acquired at different times or different prices), are urged to consult their own tax advisors regarding the Distribution and the particular consequences to them, including the applicability and effect of all U.S. federal, state, local, and foreign tax laws, and to read the Information Statement, dated May 5, 2025 filed by Ralliant with the Securities and Exchange Commission on May 5, 2025, noting the discussion therein under the heading “Material U.S. Federal Income Tax Consequences”. You may access the Information Statement at www.sec.gov.

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 28, 2025, Fortive Corporation (“Fortive”) distributed to holders of Fortive common stock, on a pro rata basis, 100 percent of the outstanding shares of Ralliant Corporation (“Ralliant”) common stock (except that any fractional shares of Ralliant common stock that Fortive shareholders otherwise would have been entitled to receive in the distribution were aggregated and sold in the public market and the aggregate net cash proceeds of these sales were distributed to those shareholders who would otherwise have been entitled to receive such fractional share) (the “Distribution”). Each Fortive shareholder received one share of Ralliant common stock for every three shares of Fortive common stock held on June 16, 2025, the record date for the Distribution.

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.

The aggregate tax basis of your shares of Fortive common stock held prior to the Distribution must be allocated between (i) the Fortive common stock you continued to hold immediately following the Distribution and (ii) the Ralliant common stock you received in the Distribution (including any

fractional shares of Ralliant common stock you were treated as having received), in proportion to their relative fair market values.

If a U.S. holder of Fortive common stock holds different blocks of Fortive common stock (generally shares of Fortive common stock purchased or acquired on different dates or at different prices), such holder should consult its tax advisor regarding the determination of the basis and holding period of shares of Ralliant common stock received in the distribution in respect of particular blocks of Fortive common stock.

There are several possible methods for determining the fair market values of the Fortive common stock or the Ralliant common stock. You should consult your tax advisor to determine the appropriate fair market values. One approach is to use the average of the high and low trading prices quoted on the New York Stock Exchange on June 30, 2025, the first trading day after the Distribution.

Based on this approach and the assumptions and calculations set forth in Line 16, your pre-Distribution basis in your Fortive common stock would be apportioned approximately 75.4% to your post-Distribution Fortive common stock and 24.6% to your Ralliant common stock (please see Line 16 for an explanation of how these percentages were calculated) (numbers are rounded for ease of review).

Item 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.

As described in Line 15 above, there are several possible methods for determining the fair market values of the Fortive common stock or the Ralliant common stock. One method for determining the fair market values is to use the average of the high and low trading prices of the Fortive common stock and the Ralliant common stock on June 30, 2025, the first trading day after the Distribution.

Using this method, the fair market value of a share of Fortive common stock on June 30, 2025 was approximately \$51.20 and the fair market value of a share of Ralliant common stock on June 30, 2025 was approximately \$50.09. Based on the one (1) to three (3) distribution ratio, this means that you would have received approximately \$16.70 of Ralliant common stock for each share of Fortive common stock you own. Based on these fair market values and the distribution ratio of one share of Ralliant common stock per three shares of Fortive common stock held, shareholders' pre-Distribution tax basis should be apportioned approximately 75.4% to their Fortive common stock and 24.6% to their Ralliant common stock (numbers are rounded for ease of review).

This calculation may be illustrated as follows (note that in this example, certain results may not reconcile due to rounding):

- Assume you own a single block of 127 shares of Fortive common stock with a tax basis of \$20 per share (and a total tax basis of \$2,540).
- You are entitled to receive 42 and one-third shares of Ralliant common stock in the Distribution. Because no fractional shares are issued, you receive 42 shares of Ralliant common stock and cash in lieu of one-third of a fractional share.
- Your total tax basis in your pre-Distribution Fortive common stock is allocated approximately \$1,915.16 to the Fortive common stock (75.4% of \$2,540.00), or \$15.08 per share (i.e., \$1,915.16 divided by 127 shares), and \$624.84 to the Ralliant common stock

(24.6% of \$2,540.00), or \$14.76 per share (i.e., \$624.84 divided by 42 and one-third shares).

- The portion of the tax basis allocated to your Ralliant common stock that relates to the one-third fractional share of Fortive common stock for which you received cash is approximately \$4.92 (one-third fractional share multiplied by \$14.76 of tax basis per share of Ralliant common stock). This would leave you with approximately \$619.92 of tax basis in your remaining shares of Ralliant common stock (i.e., \$624.84 minus \$4.92).
- The above calculations are summarized in the following table (amounts are rounded):

Tax Basis Allocation

Shares Allocation	Number of Shares	Tax Basis Allocation (per share)	Tax Basis (total)
Fortive	127	\$15.08	\$1,915.16
Ralliant (whole Shares)	42	\$14.76	\$619.92
Ralliant (fractional Shares)	One-third	\$14.76	\$4.92
Total Tax Basis			\$2,540.00

Illustrative Calculation of Basis Allocation Percentage

Common Stock	Value / Percentage
Fortive Value (a)	\$51.20
Value of Ralliant stock received for each Fortive share owned (b)	\$16.70
(a) + (b) = (c)	\$67.90
Fortive Allocation % (a) / (c)	75.4%
Ralliant Allocation % (b) / (c)	24.6%

Item 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, 368, 1001 and 1223(1).

Item 18 — Can any resulting loss be recognized?

Fortive intends for the Distribution to qualify as a “reorganization” under sections 355 and 368(a)(1)(D) of the Internal Revenue Code. Assuming that this characterization is respected, Fortive shareholders generally will not recognize any loss on the Distribution for U.S. federal income tax purposes (except to the extent that a loss may be recognized with respect to any cash received in lieu of fractional shares of Fortive common stock).

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

The Distribution occurred on June 28, 2025. As a result, the basis adjustments in the shares of Fortive common stock and Ralliant common stock 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.