



**Part II** Organizational Action *(continued)*

**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 are 354, 356, 358, and 368.

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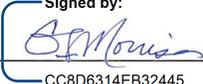
**18** Can any resulting loss be recognized? ▶ Company shareholders who receive Acquirer common stock in exchange for any portion of their Company ordinary and/or preferred shares will not recognize any loss in the Mergers. Any Company shareholders who receive only cash in exchange of their Company ordinary and/or preferred shares may recognize loss in the Mergers depending on their individual circumstances.

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**19** Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The reportable tax year is the tax year of the Company shareholder in which the Mergers closed (e.g., 2026 for calendar year taxpayers).

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**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 ▶ 3/11/2026  
Print your name ▶ Gregg Morrison Title ▶ VP of Tax & Treasurer  
Signed by: CC8D6314EB32445...

<b>Paid Preparer Use Only</b>	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.

**Attachment to Form 8937 Filed by Pemba Acquisition Sub II, LLC, as a successor of  
XConn Technologies Holdings, Ltd.**

**Part II**

**Line 14**

On February 10, 2026, Marvell Technology, Inc. (the “**Acquirer**”) acquired XConn Technologies Holdings, Ltd., (the “**Company**”) in a transaction intended to qualify as a reorganization within the meaning of Section 368(a) of the Internal Revenue Code, as amended (the “**Code**”) whereby Pemba Acquisition Sub I, Ltd., a Cayman Islands exempted company incorporated with limited liability and a direct, wholly owned subsidiary of Acquirer (“**Merger Sub I**”) merged with and into the Company (the “**First Merger**”), with the Company being the surviving corporation of the First Merger and, as part of the same overall transaction, the Company merged with and into Pemba Acquisition Sub II, LLC, a Delaware limited liability company and a direct, wholly owned subsidiary of Acquirer (“**Merger Sub II**”) (the “**Second Merger**” and, together with the First Merger, the “**Mergers**”), with Merger Sub II as the surviving corporation of the Second Merger. In the Mergers, each accredited Company shareholder exchanged his, her or its shares of Company ordinary and/or preferred shares for a combination of Acquirer common stock and cash pursuant to such Company shareholder’s election consisting of (i) a number of shares of Acquirer common stock per the specified exchange ratio, (ii) an amount in cash per the negotiated price for Company shares, (iii) a right to receive additional cash amount (the “**Holdback Amounts**”) and/or (iv) an amount in cash equal to the pro rata portion of the fund maintained to pay expenses related to the transaction (the “**Holder’s Agent Fund Amount**”). Pursuant to the Mergers, each Company shareholder who is not an accredited Company shareholder exchanged his, her or its shares of Company ordinary and/or preferred shares for cash.

**Line 15**

Each accredited Company shareholder’s aggregate basis in the shares of Acquirer common stock will generally equal the (i) tax basis of Company ordinary and/or preferred shares surrendered in the exchange, (ii) reduced by the amount of cash received in the transaction, and (iii) increased by the amount of gain recognized in the transaction. The information contained herein does not constitute tax advice and does not purport to be a complete description of all consequences that may apply to a particular shareholder. Company shareholders are urged to consult their own tax advisor with respect to the U.S. federal, state, local or non-U.S. tax consequences of the Mergers.

**Line 16**

As described in Line 15, a Company shareholder’s tax basis in the shares of Acquirer common stock received depends in part on the amount of gain, if any, recognized as a result of the Mergers. The amount of gain so recognized on such shares of Acquirer common stock equals the lesser of (i) the amount of cash received in the exchange (including any Holdback Amounts and Holder’s Agent Fund Amount), and (ii) the excess of the sum of cash received in the exchange (including any Holdback Amounts and Holder’s Agent Fund Amount) and the fair market value

of the shares of Acquirer common stock received in the exchange over the Company shareholder's adjusted tax basis in the Company ordinary and/or preferred shares surrendered in the exchange. The amount of the gain generally must be determined separately with respect to each block of Company shares owned by such shareholder.

If any shares of Company shares were acquired at different times or at different prices, the impact on the basis should be determined for each different block of Company shares exchanged in the Mergers.

Company shareholders should consult their tax advisor with respect to the computation of basis based on their specific facts.