

Report of Organizational Actions Affecting Basis of Securities

OMB No. 1545-0123

► See separate instructions.

Part I Reporting Issuer

1 Issuer's name		2 Issuer's employer identification number (EIN)	
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact	
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	
8 Date of action		9 Classification and description	
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 ►

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 ►

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 ►

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ► _____

18 Can any resulting loss be recognized? ► _____

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ► _____

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 ►

Print your name ▶ Title ▶

Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if	PTIN
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Firm's name Firm's EIN

Firm's address ►	Phone no.
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MoneyLion Inc.
EIN 85-0849243
Attachment to Form 8937

Form 8937, Part I, Box 10

ML Preferred Stock is convertible into MoneyLion Common Stock: 60938K106

Form 8937, Part I, Box 12

MoneyLion Common Stock: ML

Form 8937, Part II, Box 15 (continued)

Assuming the Earn-Out Shares qualify as deferred stock consideration, the maximum number of Earn-Out Shares generally should be treated as having been received by a holder of Even shares at the time of the Merger and adjustments to such holder's tax basis in ML shares actually received should be made if the maximum number of Earn-Out Shares issuable ultimately is not issued. A portion of the Earn-out Shares (if any) actually received by a shareholder will be treated as imputed interest and will be characterized as ordinary interest income for U.S. federal income tax purposes. A shareholder's tax basis in that portion of the Earn-out Shares would be equal to the fair market value thereof on the date of receipt. Each affected taxpayer should consult with its own tax advisor.