

Part II Organizational Action *(continued)*

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ _____
Please see attached.

18 Can any resulting loss be recognized? ▶ _____
Please see attached.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ _____
Please see attached.

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 ▶ Gary Voccio Date ▶ 3/5/2021

Print your name ▶ Gary Voccio Title ▶ Vice President, 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.			

Attachment to Form 8937

**Amphenol Corporation
EIN: 22-2785165
Stock Dividend/Split**

Please note that the following does not constitute tax advice and is provided for informational purposes pursuant to the requirements of §6045B Of the Internal Revenue Code of 1986, as amended (the "IRC"). The information provided is with respect to the U.S. federal income tax consequences only. The specific tax consequences that may apply to a particular shareholder may vary. Please consult with your tax advisor to determine the appropriate consequences to your shareholdings, including the applicability and effect of all U.S. federal and state tax laws and all foreign tax laws.

14. On March 4, 2021, Amphenol Corporation ("APH") distributed one (1) share of stock for each share of APH stock held. The distribution was made to shareholders of record as of the close of trading on February 16, 2021.

15. As a result of this distribution, the shareholders received one (1) additional share for each share owned. Therefore, the number of shares held by each shareholder doubles, but the shareholder's proportionate ownership interest in APH will remain the same. APH expects that the distribution of stock will be treated as a non-taxable distribution under IRC §305 and stock basis will need to be adjusted as required under IRC §307.

16. Pursuant to the income tax regulations issued under IRC §307, if a shareholder receives stock as a distribution on stock previously held and such distribution is non-taxable under §305, then the shareholder's basis in the stock on which the distribution was made should be allocated between the old stock and the new stock in proportion to the fair market values of each on the date of the distribution. Each shareholder will need to consult with their respective tax advisor to determine the appropriate calculation of tax basis. To calculate the change to basis, the shareholder will need, at a minimum, the number of shares held prior to the distribution, the basis in those shares held immediately prior to the distribution and the number of shares held following the distribution.

17. The applicable sections of the IRC relied upon in providing this information are §305(a) and §307(a).

18. Under the IRC, no gain or loss is expected related to this distribution.

19. The distribution was made on March 4, 2021. For an APH shareholder whose taxable year is the calendar year, the reportable tax year is 2021.