

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name ACUSHNET HOLDINGS CORP.		2 Issuer's employer identification number (EIN) 45-2644353	
3 Name of contact for additional information JENNIFER NUGNES	4 Telephone No. of contact 508-979-2000	5 Email address of contact JEN_NUGNES@ACUSHNETGOLF.COM	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact P.O. BOX 965		7 City, town, or post office, state, and ZIP code of contact FAIRHAVEN, MA 02719	
8 Date of action REPURCHASES THROUGH 12/31/2021		9 Classification and description COMMON STOCK REPURCHASE	
10 CUSIP number 005098108	11 Serial number(s)	12 Ticker symbol GOLF	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 ATTACHED 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 ATTACHED 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 ATTACHED 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 ▶ SECTIONS 301, 302, AND 316

18 Can any resulting loss be recognized? ▶ SEE ATTACHED STATEMENT

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ N/A

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 ▶ 1/12/2022

Print your name ▶ JENNIFER NUGNES Title ▶ ASSISTANT SECRETARY

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.

THIS FORM 8937 DOES NOT CONSTITUTE TAX ADVICE. SHAREHOLDERS ARE URGED TO CONSULT THEIR OWN TAX ADVISORS REGARDING THE PARTICULAR CONSEQUENCES OF THE ACUSHNET HOLDINGS CORP. REPURCHASE PLAN, INCLUDING THE APPLICABILITY AND EFFECT OF ALL U.S. FEDERAL, STATE AND LOCAL, AND FOREIGN TAX LAWS.

QUESTION 14:

THE ABOVE NAMED ISSUER REDEEMED SHARES OF COMMON STOCK FOR CASH.

QUESTION 15:

UNDER INTERNAL REVENUE CODE (“IRC”) SECTION 302, PROCEEDS RECEIVED UPON THE REDEMPTION OF STOCK MAY BE TREATED AS EITHER A PAYMENT IN EXCHANGE FOR THE STOCK OR AS A CASH DISTRIBUTION WITH RESPECT TO ALL OF THE SHAREHOLDER’S SHARE HOLDINGS UNDER IRC SECTION 301. IF THE PROCEEDS ARE TREATED AS A DISTRIBUTION, THEN PURSUANT TO IRC SECTION 316 THE AMOUNT WILL BE TREATED AS A DIVIDEND TO THE EXTENT OF THE ISSUER’S ACCUMULATED EARNINGS AND PROFITS FOR THE YEAR AS OF JANUARY 1, 2021 AND THE CURRENT EARNINGS AND PROFITS FOR THE YEAR ENDED DECEMBER 31, 2021. PURSUANT TO IRC SECTION 301 ANY AMOUNT NOT TREATED AS A DIVIDEND WILL BE TREATED AS A RETURN OF CAPITAL, WHICH WILL REDUCE THE SHAREHOLDER’S BASIS IN THEIR SHARES, AND TO THE EXTENT THE DISTRIBUTION EXCEEDS THE SHAREHOLDER’S BASIS, ANY REMAINING AMOUNT WILL BE TREATED AS A GAIN FROM THE SALE OF THE STOCK. THE ISSUER EXPECTS TO HAVE EARNINGS AND PROFITS IN EXCESS OF THE REDEMPTION PROCEEDS.

THE DETERMINATION AS TO WHETHER ANY INDIVIDUAL SHAREHOLDER’S REDEMPTION PROCEEDS WILL BE TREATED AS A SALE OR EXCHANGE OR A DISTRIBUTION UNDER IRC SECTION 302 IS MADE AT THE SHAREHOLDER LEVEL. EACH SHAREHOLDER SHOULD CONSULT THEIR TAX ADVISOR TO DETERMINE THE APPROPRIATE CLASSIFICATION OF THIS TRANSACTION.

QUESTION 16:

AS DISCUSSED UNDER QUESTION 15, THE CALCULATION OF THE CHANGE IN BASIS DEPENDS ON THE CLASSIFICATION OF THE REDEMPTION PROCEEDS UNDER IRC SECTION 302. FOR SHAREHOLDERS TREATED AS RECEIVING THE PROCEEDS AS PAYMENT IN EXCHANGE FOR THE SHARES REDEEMED, ALL OF THE SHAREHOLDER’S BASIS IN THE REDEEMED SHARES WILL BE APPLIED AGAINST THE REDEMPTION PROCEEDS. FOR SHAREHOLDERS TREATED AS RECEIVING A DISTRIBUTION UNDER IRC SECTION 301, THE AMOUNT IN EXCESS OF THE AMOUNT TREATED AS DIVIDENDS WILL BE A REDUCTION TO BASIS, WITH ANY EXCESS TREATED AS CAPITAL GAIN.

QUESTION 18:

FOR A SHAREHOLDER WHO IS TREATED UNDER IRC SECTION 302 AS RECEIVING THE PROCEEDS IN EXCHANGE FOR THEIR SHARES, THEN A LOSS CAN GENERALLY BE RECOGNIZED. FOR A SHAREHOLDER WHO IS TREATED UNDER SECTION 302 AS RECEIVING A DISTRIBUTION UNDER SECTION 301, THEN A LOSS CANNOT BE RECOGNIZED.

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