


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 Attached Statement](#)

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 ▶ [See Attached Statement](#)

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 ▶ December 18, 2025

Paid Preparer Use Only	Print your name ▶ <u>Matthew T. Peters</u>	Preparer's signature	Title ▶ <u>SVP, Chief Tax Officer & Treasurer</u>	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶				Firm's EIN ▶	
	Firm's address ▶				Phone no.	

Keenova Therapeutics plc

EIN: 98-1088325

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”), and includes a general summary regarding the application of certain U.S. federal income tax laws and regulations related to the effects of the Share Redemption (as defined below) on the tax basis among shares of Keenova Therapeutics plc (f/k/a Mallinckrodt plc), a public limited company incorporated in Ireland (“Keenova”) Ordinary Shares (as defined below), and the allocation of tax basis among shares of Keenova Ordinary Shares and Par Health, Inc., a Delaware corporation (“Par Health”), Common Stock (as defined below) following the Share Redemption (as defined below).

The information contained on Form 8937 and herein does not constitute tax advice and does not purport to be complete or describe the tax consequences that may apply to particular persons or categories of persons. Neither Keenova nor Par Health provides tax advice to its shareholders. Shareholders are urged to consult their own tax advisors regarding the particular consequences of the Redemption (as defined below), including (if applicable) the consequences of the Share Redemption, to them, including the applicability and effect of all U.S. federal, state, local and foreign tax laws. U.S. Holders are urged to carefully read the information statement filed by Keenova with the Securities and Exchange Commission on October 30, 2025 (the “Information Statement”), noting especially the discussion under the heading “Material U.S. Federal Income Tax Consequences — Material U.S. Federal Income Tax Consequences of the Share Redemption to U.S. Qualified Shareholders.”

Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Information Statement. The Information Statement may be accessed at https://www.sec.gov/Archives/edgar/data/1567892/000110465925103907/tm2529501d1_ex99-1.htm.

Form 8937 Part II, Box 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 or around October 10, 2025, Keenova issued a new series of preferred shares, par value \$0.001 per share (“Keenova Preferred Shares”), to its shareholders as of the record date of October 8, 2025, pro rata in accordance with each Keenova shareholder’s ownership of the ordinary shares, nominal value \$0.01 per share, of Keenova (“Keenova Ordinary Shares”). The Keenova Preferred Shares did not carry voting, dividend or any put rights and were stapled to the corresponding Keenova Ordinary Shares and therefore could not be traded separately from such Keenova Ordinary Shares.

On November 10, 2025, pursuant to the terms and conditions of the Separation Agreement dated as of November 10, 2025 (the “Agreement”), by and among Keenova

and Par Health, Keenova completed the separation of Par Health from Keenova and the transfer of all of the issued and outstanding shares of common stock, par value \$0.01 per share (the “Par Health Common Stock”) to Keenova shareholders (the “Spin-off”). The Spin-off was implemented by way of a redemption (the “Redemption”) of all of the issued and outstanding Keenova Preferred Shares in exchange for the following: (i) in the case of Qualified Shareholders only, the right to receive shares of Par Health Common Stock (the “Share Redemption”); and (ii) in the case of Non-Qualified Shareholders only, the right to receive cash (the “Cash Redemption”).

It is intended that the Redemption be treated for U.S. federal income tax purposes as a distribution with respect to the Keenova Ordinary Shares to which the Keenova Preferred Shares are stapled, and the remainder of this attachment assumes that such treatment will be respected.

In addition, it is intended that the Share Redemption, together with certain related transactions, qualifies as distribution pursuant to a “reorganization” described in Sections 368(a)(1)(D) and 355(a) of the Code and as a transaction that is generally tax-free to U.S. Qualified Shareholders under Section 355(a) of the Code, and the remainder of this attachment assumes that such treatment will be respected.

Form 8937 Part II, Box 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.

Assuming the Share Redemption qualifies as a “reorganization” pursuant to Sections 368(a)(1)(D) and 355(a) of the Code, the aggregate tax basis of the Keenova Ordinary Shares held by a U.S. Qualified Shareholder immediately before the Redemption must be allocated between such U.S. Qualified Shareholder’s Keenova Ordinary Shares and Par Health Common Stock in proportion to the relative fair market value of each on the date of the Share Redemption.

U.S. Qualified Shareholders of Keenova Ordinary Shares that have purchased or acquired different blocks of Keenova Ordinary Shares on different dates or at different prices should consult their tax advisors regarding the allocation of their aggregate tax basis between their Keenova Ordinary Shares and the shares of Par Health Common Stock received in the Share Redemption.

U.S. federal income tax law does not specifically prescribe how one should determine the relative fair market value of Keenova Ordinary Shares and Par Health Common Stock for purposes of determining the holder’s tax basis in such shares. There is currently no active public trading of Keenova Ordinary Shares or Par Health Common Stock on which to base such determination. U.S. Qualified Shareholders may be able to use various methods for determining the relative fair market value of the Keenova Ordinary Shares and Par Health Common Stock held on the date of the Share Redemption. U.S. Qualified Shareholders should consult their tax advisors to determine the appropriate method of determining the fair market value for this purpose.

Pursuant to the terms of the Agreement (and as further described in the Information Statement), in certain circumstances it is possible that a U.S. Qualified Shareholder may be allocated additional shares of Par Health Common Stock after the date of the Share Redemption (and potentially in a subsequent taxable year). As a result, a U.S. Qualified Shareholder may not be able to finally determine the tax basis in its shares of Par Health Common Stock received in the Share Redemption until the expiration of the Escrow Period. U.S. Qualified Shareholders should consult their tax advisors regarding the allocation of their aggregate tax basis in, and the holding period of, shares of Par Health Common Stock received in the Share Redemption, taking into account any potential adjustments to the number of the shares of Par Health Common Stock received in pursuant to the Agreement.

Form 8937 Part II, Box 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.

For U.S. federal income tax purposes, the aggregate tax basis of the Keenova Ordinary Shares held by a U.S. Qualified Shareholder immediately before the Share Redemption will be allocated between such U.S. Qualified Shareholder's Keenova Ordinary Shares and Par Health Common Stock received in the Share Redemption in proportion to the relative fair market value of each on the date of the Share Redemption. See Box 15, above, for a discussion of the determination of fair market value of the Keenova Ordinary Shares and Par Health Common Stock.

Form 8937 Part II, Box 17: List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based.

The U.S. federal income tax treatment described above is based on Sections 355, 358 and 368.

Form 8937 Part II, Box 18: Can any resulting loss be recognized?

No loss may be recognized by a U.S. Qualified Shareholder upon receipt of Par Health Common Stock in the Share Redemption.

Form 8937 Part II, Box 19: Provide any other information necessary to implement the adjustment, such as the reportable tax year.

The Share Redemption was completed on November 10, 2025. For a U.S. Qualified Shareholder whose taxable year is the calendar year, the reportable tax year is 2025.