

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 ATTACHMENT

18 Can any resulting loss be recognized? ▶ NONE

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ SEE ATTACHMENT

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 ▶ *Fabiola de Barros da Silva Goulart* Date ▶ January 30, 2020
Print your name ▶ Fabiola de Barros da Silva Goulart Title ▶ Attorney in Fact

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	<u>DOUG BEKKER</u>	<u><i>in [Signature]</i></u>	<u>01/29/2020</u>		<u>P00439876</u>
	Firm's name ▶ <u>BDO USA, LLP</u>	Firm's EIN ▶ <u>13-5381590</u>		Phone no. <u>616-774-7000</u>	
	Firm's address ▶ <u>200 OTTAWA AVE NW STE 300, GRAND RAPIDS, MI 49503</u>				

Constellation Oil Services Holding S.A.
Attachment for Form 8937
Report of Organizational Actions Affecting Basis of Securities

Page 1, Part II, Line 14

On December 18, 2019, Constellation Oil Services Holding S.A. exchanged its outstanding 9.000% Cash/0.500% PIK Senior Secured Notes due 2024 (the “Existing Notes”) for an amount equal to \$1,000 in its newly issued 10.00% PIK/Cash Senior Secured First Lien Tranche due 2024 (the “New Notes”), per \$1,000 principal amount of each of the outstanding Existing Notes, together with the right to receive the corresponding principal amount of the Second Lien Tranche and the Third Lien Tranche.

Page 1, Part II, Line 15

A U.S. person’s basis in the New Notes will be equal to their basis in the Existing Notes, increased by any gain recognized (as explained below) as a result of the exchange, reduced by any cash received in the exchange (other than amounts received in respect of accrued but unpaid interest).

Page 1, Part II, Line 16

A U.S. person will generally recognize gain (but not loss) on the exchange equal to the lesser of (i) the amount of boot received and (ii) the gain realized by such U.S. person, with gain realized equal to the issue price of the New Notes received over the U.S. person’s adjusted tax basis in the Existing Notes. As no boot was issued as part of this exchange, the holder’s basis in the New Notes should equal their basis in the Existing Notes given up in the exchange.

Page 2, Part II, Line 17

Applicable Internal Revenue Code sections and subsections are §368(a)(1)(E), §354, §356, and §358.

Page 2, Part II, Line 19

In the case of a U.S. individual taxpayer, the reportable tax year will be calendar year 2019. All taxpayers should consult with their tax advisor on the tax ramifications associated with the exchange, including but not limited to, reportable tax year, market discount, and accrued and unpaid interest.