

**Report of Organizational Actions
Affecting Basis of Securities**

OMB No. 1545-0123

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name EIGHTCO HOLDINGS INC. (f/k/a CRYPTYDE INC.)		2 Issuer's employer identification number (EIN) 87-2755739	
3 Name of contact for additional information Brett Vroman	4 Telephone No. of contact 727.287.3833	5 Email address of contact bv@8co.holdings	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 200 9th Avenue North, Suite 220		7 City, town, or post office, state, and ZIP code of contact Safety Harbor, Florida 34695	
8 Date of action April 3, 2023	9 Classification and description Reverse Stock Split (1-for 50)		
10 CUSIP number 22890A203	11 Serial number(s)	12 Ticker symbol OCTO	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**

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**

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**

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

Multiple horizontal lines for listing applicable Internal Revenue Code sections.

18 Can any resulting loss be recognized? ▶ SEE ATTACHED

Multiple horizontal lines for providing information regarding resulting loss recognition.

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

Multiple horizontal lines for providing other necessary information for the adjustment.

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 ▶ Brett Vroman Date ▶ 5/18/2023

Print your name ▶ BRETT VROMAN Title ▶ CFO

Paid Preparer Use Only

Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
<u>PAUL D. WEINBERG, CPA</u>	<u>[Signature]</u>	<u>5/17/23</u>		<u>P00168822</u>
Firm's name ▶	Firm's address ▶		Firm's EIN ▶	Phone no.
<u>WEINBERG PARTNERS LTD.</u>	<u>9205 W. RUSSELL ROAD SUITE 240 LAS VEGAS NEVADA 89138</u>		<u>36-4458657</u>	<u>(702) 793-4500</u>

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054

EIGHTCO HOLDINGS INC. (f/k/a CRYPTYDE INC.)
EIN: 87-2755739
Attachment to Form 8937
Report of Organizational Actions Affecting Basis of Securities

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 relating to the effects of the Reverse Stock Split (defined below) on a holder's adjusted U.S. tax basis. The information contained herein does not constitute tax advice and does not purport to be complete or to describe the consequences that may apply to particular categories of shareholders. Shareholders should consult their own tax advisors regarding the particular tax consequences of the Reverse Stock Split to them, including the applicability and effect of all U.S. federal, state, and local and non-U.S. tax laws.

Part II: Line 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 April 3, 2023, EIGHTCO HOLDINGS INC. effected a 1-for-50 reverse stock split of its shares of Common Stock ("Reverse Stock Split"). In connection with the Reverse Stock Split, every 50 shares of Common Stock issued and outstanding on the effective date were automatically converted to one share of Common Stock, with fractional shares being rounded up.

Line 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.

As a result of the Reverse Stock Split, every 50 shares of Common Stock of EIGHTCO HOLDINGS INC. were converted to one share of Common Stock of EIGHTCO HOLDINGS INC. In accordance with Section 307(a), shareholders must allocate the aggregate tax basis in their shares held immediately prior to the Reverse Stock Split among the shares held immediately after the Reverse Stock Split.

Shareholders should consult their own tax advisors regarding their specific tax treatment of the Reverse Stock Split and the computation of their basis in EIGHTCO HOLDINGS INC. Common Stock.

Line 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 above, Line 15. Because no fractional shares were issued, the aggregate tax basis of EIGHTCO HOLDINGS INC. Common Stock held by a shareholder immediately after

the Reverse Stock Split could be less than the aggregate tax basis immediately prior to the Reverse Stock Split by an amount equal to the aggregate tax basis allocated to the fractional share, if any.

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

Sections 305(a), 307(a), 354(a), 358(a), 368(a)(1)(E), and 1036(a).

Line 18. Can any resulting loss be recognized?

No loss may be recognized as a result of the Reverse Stock Split.

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

The basis adjustments described above are taken into account in the tax year of a shareholder during which the Reverse Stock Split occurred (e.g., 2023 for calendar year taxpayers).