

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? ▶ See attachment.

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

Sign Here 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.

Signature ▶ _____ Date ▶ _____

Print your name ▶ _____ Title ▶ _____

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	D. Ian Bristol	<i>D. Ian Bristol</i>	12/01/2023		P00743466
	Firm's name ▶ KPMG LLP	Firm's EIN ▶ 13-5565207		Phone no. (408) 367-5764	
Firm's address ▶ 3975 Freedom Circle Drive, Suite 600, Santa Clara, CA 95054					

Revolution Medicines, Inc. (as successor to EQRx, Inc.)

EIN 47-2029180

ATTACHMENT TO FORM 8937 – PART II

REPORT OF ORGANIZATIONAL ACTIONS AFFECTING BASIS OF SECURITIES

CONSULT YOUR TAX ADVISOR

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 summary of matters regarding the application of certain U.S. federal income tax laws and regulations relating to the Mergers (as defined below). 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 or warrant holders. Neither Revolution Medicines, Inc. (“Revolution Medicines”) nor EQRx, Inc. (“Target”) provides, or has provided, tax advice to its shareholders or warrant holders. You are urged to consult your tax adviser regarding the particular consequences of the Mergers to you, including the applicability and effect of all U.S. federal, state and local tax laws and foreign tax laws.

Form 8937, Part II, Box 14:

On November 9, 2023 (the “Closing Date”), upon the terms and subject to the conditions set forth in the Agreement and Plan of Merger (the “Merger Agreement”), dated as of July 31, 2023, among Revolution Medicines, Equinox Merger Sub I, Inc., a wholly-owned subsidiary of Revolution Medicines (“Merger Sub I”), Equinox Merger Sub II, LLC, a wholly-owned subsidiary of Revolution Medicines (“Merger Sub II”), and Target, and in accordance with applicable law, the following events occurred: (i) Merger Sub I merged with and into Target with Target as the surviving corporation (the “First Merger”) and (ii) immediately following the First Merger and as the second step in a single integrated transaction with the First Merger, Target merged with and into Merger Sub II with Merger Sub II as the surviving company (the “Second Merger” and together with the First Merger, the “Mergers”).

At the effective time of the First Merger:

- Each share of Target common stock that was issued and outstanding immediately prior to the effective time converted into the right to receive 0.1112 validly issued, fully paid and non-assessable shares of Revolution Medicines common stock.
- No fractional shares of Revolution Medicines common stock were issued as merger consideration, and shareholders of Target received cash in lieu of any fractional shares as part of the merger consideration.
- Each Target warrant, in accordance with its terms, automatically ceased to represent a warrant exercisable for Target common stock and became a warrant exercisable for the merger consideration that the holder of such Target warrant would have received if such Target warrant had been exercised immediately prior to the effective time.

The Mergers, taken together, are intended to qualify as a “reorganization” within the meaning of Section 368(a) of the Code. However, there are significant factual and legal uncertainties as to whether the Mergers qualify as a “reorganization” within the meaning of Section 368(a) of the Code. For more information, please see the discussion under the heading “U.S. Federal Income Tax Consequences of the Mergers” in the definitive joint proxy statement/prospectus of Revolution Medicines, dated as of and filed with the Securities and Exchange Commission on September 29, 2023.

Form 8937, Part II, Box 15:

If the Mergers, taken together, qualify as a “reorganization” within the meaning of Section 368(a) of the Code, generally:

- Holders of Target common stock that exchanged their Target common stock for Revolution Medicines common stock in the First Merger would have a tax basis in the Revolution Medicines common stock received in the First Merger (including fractional shares of Revolution Medicines common stock deemed received and exchanged for cash, as discussed below) equal to the tax basis in the Target common stock surrendered in exchange therefor. Holders of Target warrants that became warrants exercisable for Revolution Medicines common stock (“Revolution Medicines warrants”) would have a tax basis in the Revolution Medicines warrants equal to the tax basis in the Target warrants surrendered in exchange therefor.
- The Revolution Medicines common stock or warrants received in the First Merger (including fractional shares of Revolution Medicines common stock deemed received and sold for cash, as discussed below) by a holder that acquired different blocks of Target common stock or warrants at different times or at different prices would be allocated to each block of Target common stock or warrants (as applicable) of such holder, and the basis of such Revolution Medicines common stock or warrants would be determined using a block for block approach and would depend on the basis of each block of Target common stock or warrants exchanged for such Revolution Medicines common stock or warrants.
- A holder of Target common stock that received cash in lieu of a fractional share of Revolution Medicines common stock in the First Merger would be treated as having received the fractional share pursuant to the First Merger and then as having sold such fractional share for cash, and would have recognized capital gain or loss measured by the difference between the cash received for such fractional share of Revolution Medicines common stock and the portion of the holder’s aggregate tax basis in the shares of Target common stock surrendered that was allocable to such fractional share of Revolution Medicines common stock.

Form 8937, Part II, Box 16:

If the Mergers, taken together, qualify as a “reorganization” within the meaning of Section 368(a) of the Code, generally, holders that exchanged their Target common stock or warrants for Revolution Medicines common stock or warrants in the First Merger would have a tax basis in the

Revolution Medicines common stock or warrants received in the First Merger (including fractional shares of Revolution Medicines common stock deemed received and exchanged for cash) equal to the tax basis in the Target common stock or warrants surrendered in exchange therefor.

Form 8937, Part II, Box 17:

Sections 354, 356, 358, 368, 1001, and 1012 of the Code.

Form 8937, Part II, Box 18:

Under Section 356 of the Code, gain, but not loss, can be recognized, except that a loss may be recognized by shareholders of Target with respect to cash received in lieu of fractional shares of Revolution Medicines common stock.

Form 8937, Part II, Box 19:

The reportable tax year is the tax year of the taxpayer in which the Closing Date occurred.