Form **8937**
(December 2017)
Department of the Treasury
Internal Revenue Service

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

OMB No. 1545-0123

Part I Reporting Issuer

1 Issuer's name Lionsgate Studios Corp.			2 Issuer's employer identification number (EIN) 98-1864515
3 Name of contact for additional information Michael B. Hainkel	4 Telephone No. of contact 310-255-3703		5 Email address of contact Form8937@lionsgate.com
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 2700 Colorado Avenue			7 City, town, or post office, state, and ZIP code of contact Santa Monica, California 90404
8 Date of action May 6, 2025	9 Classification and description common stock		
10 CUSIP number 53626N102	11 Serial number(s)	12 Ticker symbol LION	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 attachment.

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 attachment.

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 attachment.

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 ▶ 6/18/25

Print your name ▶ BRIAN GOLDSMITH Title ▶ COO

Paid Preparer Use Only

Print/Type preparer's name	Preparer's signature	Date	Check ☐ if self-employed	PTIN
Firm's name ▶			Firm's EIN ▶	
Firm's address ▶			Phone no.	

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

Lionsgate Studios Corp.
EIN: 98-1864515

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"). This attachment includes a general summary regarding the application of certain U.S. federal income tax laws and regulations relating to the effects of the Studios Exchange (defined below) on the tax basis of New Lionsgate (defined below) common stock and the allocation of tax basis in such shares following the Studios Exchange. 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. New Lionsgate does not provide tax advice to its shareholders. You are urged to consult your own tax advisors regarding the particular consequences of the Studios Exchange to you, including the applicability and effect of all U.S. federal, state, and local tax laws and foreign tax laws.

We urge you to read the Joint Registration Statement on Form S-4 (File No. 333-282630) filed with the Securities and Exchange Commission on March 13, 2025 (the "Registration Statement"), noting especially the discussion therein under the heading "MATERIAL U.S. FEDERAL INCOME TAX CONSEQUENCES OF THE TRANSACTIONS FOR LG STUDIOS SHAREHOLDERS." You may access the Registration Statement at www.sec.gov.[1]

Line 14. Describe the organizational action and, if applicable, the date of the action or date against which shareholders' ownership is measured for the action.

Prior to May 6, 2025, Lionsgate Studios Corp. was a British Columbia unlimited liability company classified as a corporation for U.S. federal income tax purposes and was a publicly traded company ("**Studios**") with its voting common stock trading on the NASDAQ under the symbol "LION" (the "**Studios Stock**"). Immediately prior to the Arrangement Effective Time, certain public shareholders owned approximately 12.2% of the outstanding shares of Studios Stock (each a "**Studios Public Shareholder**").

On May 6, 2025, at 1:15PM Pacific Standard Time (the "**Arrangement Effective Time**"), pursuant to the terms and conditions of the Arrangement Agreement, dated January 29, 2025 and amended as of March 12, 2025 (as set forth in Annex D and Annex E to the Registration Statement), and in accordance with the laws of British Columbia, the statutory Plan of Arrangement (as set forth in Annex F to the Registration Statement) (the "**Plan of Arrangement**") became legally effective. Commencing at the Arrangement Effective Time, each of the transaction steps contemplated by Section 3.1.1(a) through Section 3.1.1(n) of the Plan of Arrangement were

[1] See https://www.sec.gov/Archives/edgar/data/929351/000119312525053519/d860983ds4a.htm

implemented sequentially and became effective at one-minute intervals (collectively, the "**Transactions**").

In relevant part, pursuant to Section 3.1.1(m) of the Plan of Arrangement (the "**Studios Exchange**"), Studios Public Shareholders transferred all of the shares of Studios Stock owned by them to Lionsgate Studios Holding Corp., a British Columbia corporation classified as a corporation for U.S. federal income tax purposes ("**New Lionsgate**"), in exchange for shares of New Lionsgate's voting common stock (the "**Lion Stock**").[2]

For U.S. federal income tax purposes, the Studios Exchange is expected to be treated as a contribution by the Studios Public Shareholders of all of the shares of Studios Stock owned by them to New Lionsgate solely in exchange for shares of Lion Stock. The Studios Exchange is intended to qualify as a transaction to which Section 351(a) of the Code applies.

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.

With respect to each Studios Public Shareholder that received shares of Lion Stock in exchange for their shares of Studios Stock pursuant to the Studios Exchange, the aggregate tax basis of the shares of Lion Stock received (including fractional shares of Lion Stock settled in cash) should be the same as the aggregate tax basis in the shares of Studios Stock surrendered by such Studios Public Shareholder.

The tax basis in each share of Lion Stock received in the Studios Exchange should reflect a pro rata portion of the aggregate tax basis in the shares of Studios Stock surrendered by such Studios Public Shareholder.

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 date.

N/A

---

[2] With respect to fractional shares of Lion Stock issued pursuant to the Transactions, the paying agent aggregated all of such fractional shares of Lion Stock and distributed the aggregate cash proceeds of the sales pro-rata to each Studios Public Shareholder who otherwise would have been entitled to receive a fractional share of Lion Stock pursuant to the Studios Exchange.

Following the Studios Exchange, and pursuant to Section 3.1.1(n) of the Plan of Arrangement, the articles of New Lionsgate were amended to change its name to Lionsgate Studios Corp. and the articles of Studios were amended to change its name to Lionsgate Studios Holding Corp. The name changes implemented by operation of Section 3.1.1(n) of the Plan of Arrangement should not impact any Studios Public Shareholder's adjusted tax basis in their shares of Lion Stock (including fractional shares of Lion Stock settled in cash) received pursuant to the Transactions.

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

Section 351(a) and Section 358(a).

Line 18. Can any resulting loss be recognized?

No loss may be recognized by a Studios Public Shareholder upon receipt of shares of Lion Stock pursuant to the Studios Exchange.

With respect to any cash received by a Studios Public Shareholder in lieu of a fractional share of Lion Stock, loss (if any) may be recognized.

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

The Transactions were effective on May 6, 2025. For a Studios Public Shareholder whose taxable year is the calendar year, the reportable tax year is 2025.