

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.

Blank lines for listing Internal Revenue Code sections.

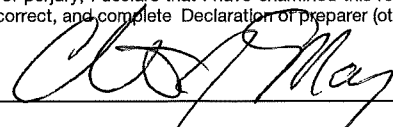
18 Can any resulting loss be recognized? ► SEE ATTACHMENT.

Blank lines for providing information regarding resulting loss.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ► **FOR HOLDERS UTILIZING A CALENDAR YEAR-END, THE ADJUSTMENT, IF ANY, WOULD BE REPORABLE IN THE TAX YEAR ENDED DECEMBER 31, 2026, HOWEVER, HOLDERS ARE ADVISED TO CONSULT THEIR OWN TAX ADVISOR REGARDING THE PROPER REPORTABLE TAX YEAR.**

Blank lines for providing other necessary information.

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 ► 3/26/26

Print your name ► **CHRISTOPHER J MAY, DAUCH CORPORATION** Title ► **EXECUTIVE VICE PRESIDENT & C.F.O.**

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ►	Firm's EIN ►			
	Firm's address ►	Phone no			

DAUCH CORPORATION

EIN: 38-3161171

Attachment to IRS Form 8937

DISCLOSURE REGARDING TAX ADVICE

The information contained herein is being provided in accordance with Section 6045B of the Internal Revenue Code of 1986, as amended (the “Code”) and the U.S. Treasury regulations promulgated thereunder (the “Treasury Regulations”), and includes a general summary regarding the application of certain U.S. federal income tax laws and regulations related to the effects of the Business Combination (defined below). The information contained 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. Former shareholders of Dowlais Group plc (“Dowlais”) are encouraged to consult their independent tax advisors regarding the particular consequences of the Business Combination (defined below) to them (including the applicability and effect of all federal, state, local, and non-U.S. laws).

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 February 3, 2026, Dauch Corporation (“Dauch”) completed its acquisition of the issued and outstanding equity of Dowlais pursuant to a Scheme of Arrangement dated as of June 19, 2025 (the “Business Combination”). Pursuant to the Business Combination, Dowlais shareholders exchanged each share of Dowlais for 0.0881 shares of common stock of Dauch (the “Share Consideration”) and 43 pence per share in cash (the “Cash Consideration” and together with the Share Consideration, the “Consideration”). Dowlais shareholders received a total of approximately 117,000,000 shares of Dauch in the Business Combination.

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

While not free from doubt, given the amount of shares of Dauch issued in the Business Combination, Dauch and Dowlais agreed to treat the transfer of Dowlais shares (x) in exchange for the Share Consideration pursuant to the Business Combination as a taxable transaction under section 1001 of the Code (the “Section 1001 Transaction”), and (y) in exchange for the Cash Consideration pursuant to the Business Combination as an exchange subject to section 304(a)(1) of the Code (the “Section 304 Transaction”).

Section 1001 Transaction. In the Section 1001 Transaction, a Dowlais shareholder converted its shares of stock in Dowlais into shares of common stock of Dauch (*i.e.*, the Share Consideration). Such Dowlais shareholder’s tax basis in each share of Dauch received in the Business Combination is generally equal to the cost of acquiring such Dauch share at the time of the Business Combination. Neither the Code nor the Treasury Regulations specifically prescribe how you

should determine the cost of the Dauch shares for purposes of determining your tax basis in your Dauch shares received in the Business Combination. One possible method would be to utilize the New York Stock Exchange volume-weighted average price per share of Dauch shares on February 3, 2026 (the closing date of the Business Combination) which was \$8.19 per share. Other reasonable methods for determining the cost of the Share Consideration received in the Business Combination may exist. You should consult your independent tax advisor to determine the appropriate method of determining the cost of the Dauch shares received in the Business Combination.

Section 304 Transaction. In the Section 304 Transaction, the Cash Consideration is deemed to have been a distribution in redemption of Dauch stock. Such deemed redemption is the organizational action causing the need for this Form 8937. In general, distributions in redemption of stock may be treated (i) as a sale or exchange under Section 302(a) (governed under the general rules discussed in Part II, Box 15, “*Section 1001 Transaction*” above) or (ii) as a dividend equivalent redemption governed under section 301 of the Code. If the redemption is equivalent to a dividend, such Dowlais shareholder is considered to have (x) transferred the stock of Dowlais to Dauch in a transaction governed under section 351 of the Code, and (y) to have had its shares in Dauch received in clause (ii)(x) redeemed immediately thereafter in a redemption taxable as a dividend.

A redemption will be taxable as an exchange under section 1001 of the Code if it results in a meaningful reduction in the Dowlais shareholder’s ownership, determined under Sections 302(b) and 304(b) of the Code. Generally, under section 304(b) of the Code, a Dowlais shareholder analyzes the application of section 302 of the Code by reference to (A) its direct or constructive ownership immediately before the Business Combination in Dowlais and (B) its constructive ownership, immediately after the Business Combination, in Dowlais (by reference to its ownership in Dauch by value). Thus, a Dowlais shareholder who does not experience a meaningful reduction in such shareholder’s ownership of Dowlais pursuant to the Business Combination would be treated as having had their shares in Dauch redeemed in a transaction taxable as a dividend.

Under section 1.302-2(c) of the Treasury Regulations, where a shareholder received an amount in redemption of stock which is taxable as a dividend, such shareholder must make proper adjustments to the basis of its remaining stock in order to preserve its basis in its shares. Neither the Code nor Treasury Regulations specifically prescribe how you should determine the reallocation of your basis in this deemed transaction. One possible method would be to reallocate your pre-Business Combination basis pro rata to your remaining shares of common stock of Dauch. You should consult your independent tax advisor to determine the appropriate method of determining your basis in your Dauch shares (including those received in the Business Combination). In general, your basis in your Dauch shares will be the cost to acquire such shares, including the shares described in Part II, Box 15, “*Section 1001 Transaction*” above.

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

In the Section 1001 Transaction, the Business Combination was a taxable transaction for U.S. federal income tax purposes. As a result, the aggregate tax basis of the Dauch shares received in the Acquisition is generally equal to the cost of acquiring the Dauch shares at the time of the Business Combination. See Part II, Box 15, “*Section 1001 Transaction*” above.

In the Section 304 Transaction, if such Dowlais shareholder did not experience a meaningful reduction as detailed in Part II, Box 15, “*Section 304 Transaction*” above, then such Dowlais shareholder must reallocate their basis to their remaining shares. See Part II, Box 15, “*Section 304 Transaction*” above.

Part II, Box 17: List the applicable Code section(s) and subsections upon which the tax treatment is based

Section 1001 Transaction. For purposes of determining the tax treatment to the Section 1001 Transaction, see sections 1001 and 1012 of the Code and the Treasury Regulations promulgated thereunder.

Section 304 Transaction. For purposes of determining the tax treatment of the Section 304 Transaction, see sections 302, 304, and 1001 of the Code and the Treasury Regulations promulgated thereunder.

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

To the extent that the transaction qualifies under section 1001 of the Code (including the Section 304 Transaction to the extent it is not a dividend equivalent transaction), loss may be recognized. To the extent that the transaction qualifies under section 302(d) as a dividend equivalent redemption, no loss shall be recognized.