

Report of Organizational Actions Affecting Basis of Securities

OMB No. 1545-0123

► See separate instructions.

Part I Reporting Issuer

1 Issuer's name		2 Issuer's employer identification number (EIN)	
JS Global Lifestyle Company Limited		98-1469079	
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact	
Leon Liu	+852 2310 8277	ir@jsjl.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact		7 City, town, or post office, state, and ZIP code of contact	
21F 238 Des Voeux Road Central, Sheung Wan		Hong Kong	
8 Date of action	9 Classification and description		
7/31/2023	Distribution of Ordinary Shares of SharkNinja, Inc. by JS Global Lifestyle Company Limited		
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)
		1691.HK	

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.](#)

18 Can any resulting loss be recognized? ► [See attached.](#)

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ► [See attached.](#)

**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 ► **Run Han**

Title ► **Chief Financial Officer**

**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.	

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

JS Global Lifestyle Company Limited

EIN: 98-1469079

ATTACHMENT TO FORM 8937

REPORT TO ORGANIZATIONAL ACTIONS AFFECTING BASIS OF SECURITIES

DISTRIBUTION OF SHARKNINJA, INC. ORDINARY SHARES

The information contained herein is being provided pursuant to the requirements of Internal Revenue Code Section (“Section”) 6045B and includes a general summary regarding the application of certain U.S. federal income tax laws and regulations relating to the effects of the Distribution (as defined below) on the tax basis of the shares of JS Global Lifestyle Company Limited (the “Company” or “JS Global”) following the Distribution. You are urged to consult your own tax advisers regarding the particular consequences of the Distribution to you, including the applicability and effect of all U.S. federal, state and local tax laws, and foreign tax laws.

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 Monday, July 31, 2023, JS Global (Stock code: 1691.HK) distributed to its shareholders who held JS Global ordinary shares (each a “**JSG Ordinary Share**”) on July 4, 2023 (the “**Record Date**”) one SharkNinja ordinary share (each a “**SN Ordinary Share**”) for every 25 JSG Ordinary Shares held by such shareholder as of the Record Date (the “**Distribution**”). Upon completion of the Distribution, SharkNinja, Inc. (“**SharkNinja**”) became an independent public company, with its SN Ordinary Shares trading on the New York Stock Exchange under the ticker symbol “**SN**.”

Box 15

Describe the quantitative effect of the organizational action on the basis of the security in the hands of the U.S. taxpayer as an adjustment per share or as a percentage of old basis.

The Distribution was a taxable distribution by JS Global for U.S. federal income tax purposes pursuant to Section 311(b). The SN Ordinary Shares were appreciated property such that gain should be recognized by JS Global as if the shares were sold to the distributee shareholders at their fair market value. Distributee shareholders, in turn, were generally treated as receiving a taxable distribution equal to the fair market value of the SN Ordinary Shares received.

U.S. federal income tax law does not specifically identify how to determine the fair market value of the SN Ordinary Shares for purposes of Section 301(d). One method for determining such fair market value is to utilize the opening share price on the New York Stock Exchange for the SN Ordinary Shares on July 31, 2023 (the first trading day after the Distribution), which is US\$ 30.05. JS Global and SharkNinja each intend to use US\$ 30.05 as the fair market value of an SN Ordinary Share for its own reporting purposes, which is equivalent to US\$ 1.202 of the Distribution per each JSG Ordinary Share, but this valuation is not binding on the Internal Revenue Service (“**IRS**”) or the courts, and the IRS may assert that a different value should be used (*e.g.*, a value based on an average or weighted average calculation of trading prices over one or more trading days or other methodology).

Shareholders of the JSG Ordinary Share as of the Record Date are urged to consult their own tax advisors as to how to determine the fair market value of the SN Ordinary Shares received in the Distribution.

JS Global does not currently expect to have sufficient current and accumulated earnings and profits (“**E&P**”) as described in Section 316 to treat the entire amount of the Distribution paid as dividends for U.S. federal income tax purposes. Accordingly, JS Global currently expect that 87.72% of the Distribution will be treated as a dividend for U.S. federal income tax purposes within the meaning of Section 301(c)(1) and the remaining 12.28% will be treated as return of capital distributions and capital gains within the meaning of Sections (c)(2) and (c)(3), respectively. Specifically, the portion of the Distribution treated as return of capital within the meaning of Section 301(c)(2) will reduce the shareholders basis in the JSG Ordinary Shares to the extent thereof and any excess will be treated as capital gains to shareholders of JS Global. Shareholders should consult their own tax advisors to determine the income tax consequences of their specific situation. JS Global is providing this Form 8937 for informational purposes only and not as legal or tax advice.

The quantitative effect of the Distribution of US\$ 1.202 for every JSG Ordinary Share is set forth in the table below:

Record Date	Payment Date	The Distribution treated as a dividend within the meaning of Section 301(c)(1)	The Distribution treated as return of capital distributions and capital gains within the meaning of Sections 301(c)(2) and (c)(3)
July 4, 2023	July 31, 2023	US\$ 1.0543944	US\$ 0.1476056

Pursuant to Section 301(c)(2), shareholders of the JSG Ordinary Shares should reduce their adjusted tax basis in such JSG Ordinary Shares, but not below zero, by the portion of the Distribution that is not a dividend. Shareholders that hold multiple blocks of the JSG Ordinary Shares (generally, ordinary shares acquired at different times and at different prices) will generally perform this calculation separately with respect to each block stock.

For information on any impact of the Distribution to shareholders’ adjusted tax basis in the SN Ordinary Shares, please review Form 8937 prepared by SharkNinja, available at <https://ir.sharkninja.com/overview/default.aspx>.

The information contained in this Form 8937 is based on reasonable assumptions and estimates. These estimates and assumptions can change throughout the year and, if they do, JS Global will file a corrected Form 8937 pursuant to the applicable Treasury Regulations. Final tax reporting for the Distribution and any other distributions made in the year ending December 31, 2023, will occur on Form 1099-DIV, which will be issued in January 2024.

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.

See the response in Box 15.

Box 17

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

Sections 301, 311(b), and 316.

Box 18

Can any resulting loss be recognized?

Not applicable.

Box 19

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

The Distribution occurred on July 31, 2023. For calendar year taxpayers, the Distribution is to be reported in the year ending December 31, 2023.