



**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.

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18 Can any resulting loss be recognized? ▶ See attached.

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

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**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 ▶ Run Han Date ▶ \_\_\_\_\_

Print your name ▶ Run Han Title ▶ Chief Financial Officer

<b>Paid Preparer Use Only</b>	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.

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**

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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 Distributions (as defined below) on the tax basis of the shares of JS Global Lifestyle Company Limited (Stock code: 1691.HK) (“JS Global”) following the Distributions. You are urged to consult your own tax advisers regarding the particular consequences of the Distributions 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 distributed to its shareholders who held JS Global ordinary shares (each a “**JSG Ordinary Share**”) on July 4, 2023 (the “**SN Distribution Record Date**”) one SharkNinja ordinary share (each a “**SN Ordinary Share**”) for every 25 JSG Ordinary Shares held by such shareholder as of the SN Distribution Record Date (the “**SN Distribution**”). Upon completion of the SN Distribution, SharkNinja, Inc. (“**SharkNinja**”) became an independent public company, with its SN Ordinary Shares trading on the New York Stock Exchange (the “**NYSE**”) under the ticker symbol “**SN**.”

Furthermore, on September 28, 2023, JS Global distributed to its shareholders who held JSG Ordinary Shares on September 15, 2023, (the “**September Distribution Record Date**”) an interim dividend of HK\$ 0.0392 (equivalent of approximately US\$ 0.005) per share (the “**September Distribution**”).

The SN Distribution and the September Distribution are collectively referred as the “**Distributions**.”

**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 SN 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 is 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 NYSE for the SN Ordinary Shares on July 31, 2023 (the first trading day after the SN 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 SN 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 Shares as of the SN Distribution 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 SN Distribution.

JS Global does not expect to have sufficient current and accumulated earnings and profits (“E&P”) as described in Section 316 to treat the entire amount of the Distributions paid as dividends for U.S. federal income tax purposes. Accordingly, JS Global determined that 87.00% of the SN Distribution is treated as a dividend for U.S. federal income tax purposes within the meaning of Section 301(c)(1) and the remaining 13.00% is treated as return of capital distributions and capital gains within the meaning of Sections (c)(2) and (c)(3), respectively. Furthermore, JS Global determined that 86.16% of the September Distribution is treated as a dividend for U.S. federal income tax purposes within the meaning of Section 301(c)(1) and the remaining 13.84% is 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 Distributions 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 SN Distribution of US\$ 1.202 for every JSG Ordinary Share is set forth in the table below:

<b>SN Distribution Record Date</b>	<b>Payment Date</b>	<b>The SN Distribution treated as a dividend within the meaning of Section 301(c)(1)</b>	<b>The SN Distribution treated as return of capital distributions and capital gains within the meaning of Sections 301(c)(2) and (c)(3)</b>
July 4, 2023	July 31, 2023	US\$ 1.04574	US\$ 0.15626

The quantitative effect of the September Distribution of US\$ 0.005 for every JSG Ordinary Share is set forth in the table below:

<b>September Distribution Record Date</b>	<b>Payment Date</b>	<b>The September Distribution treated as a dividend within the meaning of Section 301(c)(1)</b>	<b>The September Distribution treated as return of capital distributions and capital gains within the meaning of Sections 301(c)(2) and (c)(3)</b>
September 15, 2023	September 28, 2023	US\$ 0.004308	US\$ 0.000692

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 Distributions that is not treated as 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 SN Distribution to shareholders' adjusted tax basis in the SN Ordinary Shares, please review Form 8937 prepared by SharkNinja, available at <https://ir.sharkninja.com/resources/investor-faqs/default.aspx>.

**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 SN Distribution occurred on July 31, 2023, and the September Distribution occurred on September 28, 2023. For calendar year taxpayers, the SN Distribution and the September Distribution are to be reported in the year ending December 31, 2023.