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

Pa	art I Rep	orting	Issuer				•		
1	Issuer's name					:	2 Issuer's employer identification number (EIN)		
BlackRock Finance, Inc. (f/k/a as BlackRock, Inc.)							32-0174431		
			ditional information		Telephone No. of contact		5 Email address of contact		
	kRock Invest				(212)810-5087		invrel@blackrock.com		
6	Number and s	street (or F	P.O. box if mail is not	delivered to	street address) of contact	t i	7 City, town, or post office, state, and ZIP code of contact		
50 F	ludson Yards	i				N	ew York, NY 10001		
-	Date of action			9 Class	sification and description				
	ober 1, 2024			Commor					
10	CUSIP numbe	er	11 Serial number(s)	12 Ticker symbol	1:	3 Account number(s)		
Do	09247X10		anal Action Attac	ah additiona	BLK	L Coo book	of form for additional quantions		
14							of form for additional questions. st which shareholders' ownership is measured for		
17	the action ▶			аррпоавіє, тте	date of the action of the	e date agains	which shareholders ownership is measured for		
		See att	acried.						
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 pershare or as a percentage of old basis > See attached.									
	share or as a	a percenta	age of old basis $\triangleright \underline{s_0}$	ee attached.					
16	Describe the valuation date			pasis and the	data that supports the ca	alculation, su	ch as the market values of securities and the		

Pa	rt II		Organizational Action (continued	()		
17	List	t the	applicable Internal Revenue Code sectio	n(s) and subsection(s) upon which t	he tax treatment is based ▶	See attached.
18	Car	n any	resulting loss be recognized? ► See at	tached.		
19	Pro	vide	any other information necessary to imple	ment the adjustment, such as the r	eportable tax year ► See at	ttached.
			penalties of perjury, I declare that I have exa it is true, correct, and complete. Declaration of			
Sign	1				1 ~	Sit
Here	e S	Signa	ture ▶		Date ▶([] →	124
	F	Print y	your name > Young Chung		Title Manag	ing Director
Paid			Print/Type preparer's name	Preparer's signature	Date	Check if self-employed
Pre _l Use			Firm's name			Firm's EIN ►
			Firm's address ►			Phone no.

BlackRock Finance, Inc. (formerly known as BlackRock, Inc.) EIN: 32-0174431 Attachment to Form 8937

The information contained herein is being provided pursuant to Section 6045B of the Internal Revenue Code of 1986, as amended (the "Code"). This attachment includes a general summary regarding certain U.S. federal income tax laws and regulations relating to the effects of the Merger on the tax basis of shares of New BlackRock Common Stock received in exchange for shares of Old BlackRock Common Stock (each as defined below). The information provided on Form 8937 does not constitute tax advice and does not purport to be complete or to describe the consequences that may apply to particular categories of stockholders. Stockholders are urged to consult their tax advisors regarding the Merger and its particular consequences to them, including the applicability and effect of all U.S. federal, state, local, and foreign tax laws.

Part II, Line 14

On October 1, 2024 (the "Closing Date"), pursuant to that certain Transaction Agreement dated as of January 12, 2024, by and among BlackRock, Inc. (formerly known as BlackRock Funding, Inc.), a Delaware corporation ("New BlackRock"), BlackRock Finance, Inc. (formerly known as BlackRock, Inc.), a Delaware corporation ("Old BlackRock"), Banana Merger Sub, Inc., a Delaware corporation ("Merger Sub"), Global Infrastructure Management, LLC, a Delaware limited liability company (referred to herein as Global Infrastructure Partners ("GIP")), and the other parties named therein, (i) Merger Sub merged with and into Old BlackRock at the closing (the "Closing") of the transaction in accordance with Section 251(g) of the Delaware General Corporation Law, with Old BlackRock continuing as the surviving corporation and a wholly owned subsidiary of New BlackRock (the "Merger"), and (ii) at the Closing and immediately following the Merger, New BlackRock acquired 100% of the issued and outstanding limited liability company interests of GIP, for a total consideration of \$3 billion in cash and approximately 12 million shares of New BlackRock Common Stock (as defined below) (the "GIP Contribution").

As a result of the Merger, among other things, (i) New BlackRock became the ultimate parent of Old BlackRock, GIP and their respective subsidiaries and (ii) each share of common stock, \$0.01 par value ("Old BlackRock Common Stock"), of Old BlackRock issued and outstanding immediately prior to the effective time of the Merger (other than shares of Old BlackRock Common Stock held in treasury by Old BlackRock not held on behalf of a third party, which shares were cancelled) were converted automatically into one share of common stock, \$0.01 par value, of New BlackRock ("New BlackRock Common Stock").

Following the Closing Date, the shares of New BlackRock Common Stock traded on the New York Stock Exchange under the symbol "BLK."

Part II, Line 15

The Merger and the GIP Contribution are intended to qualify as a transfer described in Section 351(a) of the Code, and the Merger is intended to qualify as a reorganization within the meaning of section 368(a) of the Code. Assuming such treatment, the aggregate basis of the New BlackRock Common Stock received by a holder of Old BlackRock Common Stock will generally be equal to the basis in the Old BlackRock Common Stock surrendered in exchange therefor.

Part II, Line 16

See above for description of the effect of the Merger on a shareholder's basis in its Old BlackRock Common Stock. Shareholders should consult with a qualified tax advisor for more information.

Part II, Line 17

Sections 351, 354(a), 358(a), and 368(a) of the Code.

Part II, Line 18

In accordance with the treatment of the Merger and the GIP Contribution as a transfer described in Section 351(a) of the Code and/or the Merger as a reorganization within the meaning of section 368(a) of the Code, holders of Old BlackRock Common Stock will generally not recognize any loss as a result of their receipt of New BlackRock Common Stock in the Merger.

Part II, Line 19

The reportable event occurred on October 1, 2024, and is reportable in the shareholder's tax year that includes that date.