

DSS, Inc.

1 for 20 reverse split of common stock

Form 8937, Attachment

THE INFORMATION CONTAINED HEREIN DOES NOT CONSTITUTE TAX ADVICE AND DOES NOT PURPORT TO BE COMPLETE OR TO DESCRIBE THE TAX CONSEQUENCES OF THE REVERSE STOCK SPLIT THAT MAY APPLY TO PARTICULAR CATEGORIES OF SHAREHOLDERS. SHAREHOLDERS ARE URGED TO CONSULT THEIR OWN TAX ADVISOR WITH RESPECT TO THE U.S. FEDERAL, STATE AND LOCAL AND FOREIGN TAX CONSEQUENCES OF THE REVERSE STOCK SPLIT.

#### Part II – Organizational Action

*Line 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 January 4, 2024, DSS, Inc. (the "Company") effected a 1-for-20 reverse stock split for its outstanding shares of common stock. Pursuant to the reverse stock split, every twenty (20) shares of issued and outstanding common stock automatically converted into one (1) share of common stock.

No fractional shares were issued in connection with the reverse stock split. Instead, the Company issued one whole share of common stock to any stockholder who would have been entitled to receive a fractional share of common stock due to the reverse stock split.

*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.*

Upon the effective date of the reverse stock split, every twenty (20) shares of common stock of the Company automatically converted into one (1) share of common stock. As a result, shareholders must allocate the aggregate tax basis in their shares held immediately prior to the reverse stock split among the shares held immediately after the reverse stock split. Shareholders that have acquired different blocks of common stock at different times or at different prices are urged to consult their own tax advisors regarding the allocation of their aggregated adjusted basis among, and the holding period of, that common stock.

*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 dates.*

See response to Line 15. While the basis "per share" is impacted, the basis of the shareholder's total investment remains unchanged. Shareholders with blocks of pre-split common stock not divisible by twenty (20) which reflect pre-split common stock acquired at different times or different prices must replicate such blocks of pre-split common stock in the post-split common stock received pursuant to a formula provided in Treasury regulations that seek to preserve, to the greatest extent possible, the basis of a particular block of pre-split common stock in one of more post-split common stock shares received in exchange therefor. This may require the aggregate basis in one block of pre-split common stock to be allocated to post-split common stock in a manner where some post-split common stock blocks may have split basis and holding period segments.

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

Internal Revenue Code Sections 354(a), 358(a), 368(a) and 1001.

Line 18. *Can any resulting loss be recognized?*

The one (1) for twenty (20) reverse stock split is intended to be treated as a recapitalization for U.S. Federal income tax purposes. Therefore, a shareholder will not recognize any gain or loss for U.S. federal income tax purposes upon the combination of pre-reverse stock split shares into post-reverse stock split shares pursuant to the reverse stock split.

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

The reportable tax year in which the reverse stock split occurred is 2024.