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

Part I Reporting Issuer

1 Issuer's name: Magenta Buyer LLC	2 Issuer's employer identification number (EIN): 86-2893753

3 Name of contact for additional information: Sameer Syed	4 Telephone No. of contact: 214-676-8221	5 Email address of contact: Taxes@Trellix.com

6 Number and street (or P.O. box if mail is not delivered to street address) of contact: 1300 El Camino Real, Suite 300	7 City, town, or post office, state, and ZIP code of contact: Menlo Park, CA 94025

8 Date of action: 8/14/2024	9 Classification and description: Debt Exchange: First Lien Term Loan, Second Lien Term Loan

10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)
55910RAB9, 55910RAE3			

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 attachment.

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 attachment.

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 attachment.

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.

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

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

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 ▶ DocuSigned by: Tara Flanagan D030FC0DE917404... Date ▶ Sep-28-2024

Print your name ▶ Tara Flanagan Title ▶ Assistant Secretary

Paid Preparer Use Only

Print/Type preparer's name	Preparer's signature	Date	Check ☐ if self-employed	PTIN
Travis Bridenstine		9/27/2024		P01308382
Firm's name ▶ Deloitte Tax LLP			Firm's EIN ▶	86-1065772
Firm's address ▶ 12830 El Camino Real #600, San Diego, CA 92130			Phone no.	619-232-6500

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

Magenta Buyer LLC
EIN 86-2893753
Attachment to Form 8937

Disclaimer: The information contained in Form 8937 and this attachment does not constitute tax advice and does not purport to take into account any lender's specific circumstances. Lenders are urged to consult their own tax advisors regarding U.S. tax consequences of the transactions described herein and the impact to tax basis resulting from the amendments.

Form 8937, Part II, Line 14

Immediately prior to August 14, 2024, Magenta Buyer LLC and Magenta Intermediate LLC (the "Issuers") and various lenders (the "Lenders") were parties to approximately $3,075,000,000 principal of First Lien Initial Term Loans due July 27, 2028 (the "Original 1L"), $409,000,000 principal of Incremental First Lien Term Loan due July 27, 2028 (the "Incremental 1L") and $750,000,000 principal of Second Lien Term Loan due July 27, 2029 (the "Original 2L").

On August 14, 2024, pursuant to agreements between the Issuers and certain of the Lenders (the "Participating Lenders"), in full satisfaction of $2,644,384,797 principal of Original 1L, $400,822,990 principal of the Incremental 1L, and $649,926,450 principal of the Original 2L (collectively, the "First Closing Exchange Instruments"), the Participating Lenders received one or more of the following instruments issued by Magenta Security Holdings LLC, an indirect wholly-owned subsidiary of Magenta Buyer LLC (each of Magenta Buyer LLC, Magenta Intermediate LLC, and Magenta Security Holdings LLC is treated as an entity disregarded from its regarded owner (STG Magenta Aggregator LP) for U.S. federal income tax purposes):

- $1,489,222,812 principal of First Out Term Loans due July 27, 2028 (the "First Out Term Loan")
- $974,781,305 principal of Second Out Term Loans due July 27, 2028 (the "Second Out Term Loan")
- $691,549,570 principal of Third Out Term Loans due July 27, 2028 (the "Third Out Term Loan")

The above amounts under the First Out Term Loan, Second Out Term Loan, and Third Out Term Loan are collectively referred to as the "First Closing Consideration."

Furthermore, a holder of approximately $43,167,959 of Original 2L (the "Exchange Holder") exchanged such Original 2L for approximately $43,167,959 of security principal issued (the "LP Security") by STG Magenta Aggregator LP (the "HoldCo Debt Exchange").

Form 8937, Part II, Line 15

The Issuers expect to report the transactions described above as taxable exchanges under section 1001 for U.S. federal income tax purposes. In general, a holder of the First Closing Exchange Instruments is expected to recognize gain or loss equal to the difference, if any, between (i) the "issue price" of each of the First Out Term Loan, Second Out Term Loan, and Third Out Term Loan and (ii) such holder's adjusted tax basis in its respective First Closing Exchange Instruments exchanged therefor. In general, the Exchange Holder is expected to recognize gain or loss equal to the difference, if any, between the fair market value of the LP Security and such holder's adjusted tax basis in its respective Original 2L exchanged therefore.

The Issuers have assumed the issue price of the First Out Term Loan, Second Out Term Loan, and Third Out Term Loan will be based on the respective fair market value of such instruments.

The Participating Lenders and the Exchange Holder should consult their tax advisors to determine the tax consequences of the above exchanges to them.

Form 8937, Part II, Line 16

Each Participating Lender who exchanged an interest in the First Closing Exchange Instruments for an interest in the First Closing Consideration, and the Exchange Holder who exchanged Original 2L for the LP Security, is expected to recognize gain or loss upon such exchange. In that event, such Participating Lender's tax basis in such portion of the First Closing Consideration, and the Exchange Holder's tax basis in the LP Security, is expected to be approximately equal to the fair market value thereof as of August 14, 2024. The Issuers have not determined the fair market value of the First Out Term Loan, Second Out Term Loan, Third Out Term Loan, or LP security.

Participating Lenders and the Exchange Holder should consult their tax advisors to determine the tax consequences of the above transactions to them.

Form 8937, Part II, Line 17

Sections 1001(a), 1012(a)

Form 8937, Part II, Line 18

The Participating Lenders and the Exchange Holder may recognize loss.

Participating Lenders and the Exchange Holder should consult their tax advisors to determine the tax consequences of the exchanges to them.

Form 8937, Line 19

The basis consequences are taken into account in the tax year of the Participating Lenders and the Exchange Holder that includes August 14, 2024.