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 | | 2 Issuer's employer identification number (EIN) | | | |
| The Options Clearing Corp | noration | | | 36-2756407 | |
| 3 Name of contact for add | ditional information | 5 Email address of contact | | | |
| | | | | | |
| Thomas Crider | | 1 21 6 4 | 312.322.6200 | Form8937@theocc.com | |
| 6 Number and street (or F | 2,O, box if mail is not | delivered to s | street address) of contact | 7 City, town, or post office, state, and ZIP code of contact | |
| 125 S. Franklin Street Suit | e 1200 | | | Chicago, IL 60606 | |
| 8 Date of action | | | | | |
| | | ************************************** | | | |
| June 23, 2025 | dd | | on shares of Pegasystems | | |
| 10 CUSIP number | 11 Serial number(| S) | 12 Ticker symbol | 13 Account number(s) | |
| | All serie | es | PEGA | | |
| Part II Organization | | | | e back of form for additional questions. | |
| | | | | e against which shareholders' ownership is measured for | |
| the action ► Each or | utstanding options | contract on s | shares of Pegasystems Inc. | (PEGA) is replaced by 2 | |
| contracts to reflect a 2 for | 1 share split. Effect | ive date is J | une 23, 2025. | | |
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| 15 Describe the quantitat | tive offers of the even | nizational ant | ion on the basis of the economi | the in the hands of a LLC towns on an artificial and | |
| | | | | ty in the hands of a U.S. taxpayer as an adjustment per is allocated to each of the 2 replacement contracts. | |
| | 30 | 7% OF THE DAS | is in each existing contract | is anocated to each of the 2 replacement contracts. | |
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| | - | | • • | ation, such as the market values of securities and the | |
| valuation dates ► Tax | basis in existing co | ontracts is al | located proportionately acre | oss the replacement contracts. | |
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| Pai | Ш | Organizational Action (continued | <u>) </u> | | | | | | |
|---|---|--|--|---------------------------------------|---|--|--|--|--|
| 17 | List | the applicable Internal Revenue Code section | n(s) and subsection(s) upon which the tax tre | eatment is based > | Section 1012 (a) | | | | |
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| 18 | Can | any resulting loss be recognized? ► No. | | | | | | | |
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| 19 | Prov | vide any other information necessary to imple | ement the adjustment, such as the reportabl | e tax year ▶ | | | | | |
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| | ι | Under penalties of perjury, I declare that I have exa | amined this return, including accompanying sched | dules and statements, a | 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. | | | | | | | |
| Sig | - 1 | \sim 1 \sim 7// | | | | | | | |
| Her | e { | Signature > 1 // June (1) | | Date ► | 2025 | | | | |
| | | | | | | | | | |
| | | Print your name ► Thomas Crider Print/Type preparer's name | Preparer's signature | Title ► Executive I | DTINI | | | | |
| Pai | | | | | Check if first self-employed | | | | |
| Prepa Use 0 | | | | J | Firm's EIN ▶ | | | | |
| | | Firm's address > Phone no. | | | | | | | |
| Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-00 | | | | | | | | | |