

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](#)

18 Can any resulting loss be recognized? ▶ [SEE ATTACHED](#)

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

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.

Sign Here
Signature ▶ _____ Date ▶ _____
Print your name ▶ _____ Title ▶ _____

| | | | | | |
|-------------------------------|---------------------------------------|----------------------|------|---|------|
| Paid Preparer Use Only | Print/Type preparer's name | Preparer's signature | Date | Check <input type="checkbox"/> if self-employed | PTIN |
| | Firm's name ▶ DELOITTE TAX LLP | | | Firm's EIN ▶ 86-1065772 | |
| | Firm's address ▶ | | | Phone no. | |

Sabre GBL Inc.

EIN 75-2109502

Attachment to Form 8937

Report of Organizational Actions Affecting Basis of Securities

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

Sabre GBL Inc.
EIN 75-2109502
Attachment to Form 8937
Report of Organizational Actions Affecting Basis of Securities

Form 8937, Part I, Line 9

December 8, 2025 – settlement date for early tenders

December 23, 2025 – settlement date for late tenders

Form 8937, Part I, Line 10

See below.

Form 8937, Part II, Line 14

In December 2025, Sabre GBL Inc. (the “Issuer” or the “Company”) settled exchange offers (the “Exchange Offers”) to exchange certain of the Company’s outstanding senior secured notes for its newly issued 10.750% Senior Secured Notes due 2030 (the “New Notes”). The outstanding notes subject to the Exchange Offers were the Company’s outstanding 8.625% Senior Secured Notes due 2027 (the “June 2027 Notes”), 11.250% Senior Secured Notes due 2027 (the “December 2027 Notes”), and 10.750% Senior Secured Notes due 2029 (the “November 2029 Notes” and, together with the December 2027 Notes and the June 2027 Notes, the “Existing Notes”).

Exchanges of Existing Notes tendered by the early exchange deadline of December 4, 2025 were settled on December 8, 2025 (the “Early Settlement Date”). Exchanges of Existing Notes tendered after the early exchange deadline and before the expiration date for the Exchange Offers were settled on December 23, 2025 (the “Final Settlement Date”).

The following is a summary of the Existing Notes that were retired in the Exchange Offers:

| Existing Notes | CUSIP | Principal Amount Exchanged | Interest Rate | Maturity |
|-----------------------|---|-----------------------------------|----------------------|-----------------|
| June 2027 Notes | 78573NAJ1 (144A); U86043AG8 (Reg. S) | \$240,176,000 | 8.625% | 6/1/2027 |
| December 2027 Notes | 78573NAH5 (144A); U86043AF0 (Reg. S) | \$44,256,000 | 11.250% | 12/15/2027 |
| November 2029 Notes | 78573NAL6 (144A); U86043AJ2 (Reg. S) | \$378,999,000 | 10.750% | 11/15/2029 |

The following is a summary of the consideration issued in the Exchange Offers with respect to each \$1,000 principal amount of Existing Notes:

| Existing Notes Exchanged | Exchange Consideration (per \$1,000 principal amount of Existing Notes) |
|---------------------------------|--|
| June 2027 Notes | \$755.00 in cash ¹ and \$320.00 principal amount of New Notes |
| December 2027 Notes | \$755.00 in cash ² and \$320.00 principal amount of New Notes |
| November 2029 Notes | \$60.00 in cash and \$1,000.00 principal amount of New Notes |

In addition to the consideration described above, tendering holders received a cash payment for accrued, unpaid interest on the Existing Notes (from the date the holder tendered its Existing Notes to but not including the Early Settlement Date). Interest began running on the New Notes beginning on the Early Settlement Date.³

The New Notes issued in the Exchange Offers are the Company's senior secured obligations and are guaranteed on a senior secured basis by the same guarantors that guaranteed the Existing Notes. The New Notes will mature on March 15, 2030 and will bear interest at a rate per annum equal to 10.750% per annum. The New Notes will be redeemable, at the Company's option, starting on March 15, 2027, at 105.375% of their outstanding principal amount, plus accrued interest, and under certain other circumstances.

Following is a summary of the terms of the New Notes:

| Notes | CUSIP | Principal Amount | Interest Rate | Maturity |
|--------------|---|----------------------------|----------------------|-----------------|
| New Notes | 78573NAN2 (144A); U86043AL7 (Reg. S) | \$469,802,000 ⁴ | 10.750% | 3/15/2030 |

¹ The cash consideration consisted of \$680 plus a \$75 early exchange premium payable to holders who tendered by the early exchange deadline. The Company subsequently amended the terms of the Exchange Offers so that holders tendering after the early exchange deadline would receive the same consideration as holders who tendered by the early exchange deadline.

² See note 1 above.

³ Any New Notes issued on the Final Settlement Date were issued with accrued interest from the Early Settlement Date (i.e., with pre-issuance interest). For New Notes issued on the Final Settlement Date, the amount of pre-issuance interest was deducted from the amount of cash paid for accrued, unpaid interest on the Existing Notes.

⁴ The aggregate principal amount of \$469,802,000 consisted of a principal amount of \$468,372,000 issued on the Early Settlement Date and a principal amount of \$1,430,000 issued on the Final Settlement Date. Under the terms of the Exchange Offers, the principal amount of New Notes issued in exchange for the Existing Notes was rounded downward to the nearest authorized denomination.

Form 8937, Part II, Line 15

This Form 8937 addresses the tax consequences to an existing holder that participated in the Exchange Offers. The retirement of Existing Notes pursuant to the Exchange Offers are referred to as the “Exchanges.” Holders that participated in the Exchanges are referred to as the “Participating Holders.”

The Issuer intends to treat each Exchange as a significant modification (*i.e.*, a debt-for-debt exchange) under Treas. Reg. § 1.1001-3. The tax consequences of an Exchange to a Participating Holder will depend on whether the Existing Notes of a particular series surrendered and the New Notes received therefor represent “securities” for purposes of the rules providing for nontaxable recapitalizations under section 368(a)(1)(E). If both the Existing Notes of a particular series and the New Notes constitute “securities,” an Exchange should be treated as a nontaxable recapitalization under section 368(a)(1)(E) (with gain recognized only to the extent of any cash received in the Exchange). To the extent that either the Existing Notes or New Notes are not securities, an Exchange does not qualify as a nontaxable recapitalization.

The Issuer does not anticipate that the New Notes are securities for these purposes. Accordingly, the Issuer does not intend to treat the exchange of Existing Notes of a particular series for New Notes as a recapitalization for U.S. tax purposes. If an Exchange does not qualify as a recapitalization, a Participating Holder will recognize gain or loss with respect to the Exchange in an amount equal to the difference between (i) the issue price of the New Notes received in the Exchange and (ii) the Participating Holder’s adjusted tax basis in its Existing Notes of a particular series on the date of the Exchange (excluding any basis attributable to accrued, unpaid interest).

If, contrary to the Issuer’s expectation, the exchange of Existing Notes of a particular series for New Notes is treated as a recapitalization, a Participating Holder will not recognize loss on the exchange, but will recognize gain, if any, equal to the lesser of (i) the amount of “boot” received in the exchange and (ii) the gain realized, which is equal to the excess of the amount realized over the U.S. holder’s adjusted tax basis in the Existing Notes of a particular series surrendered. The amount of boot is equal to the amount of cash received in the Exchange (excluding cash received with respect to accrued and unpaid interest). The amount realized in the Exchange is the sum of the issue price of the New Notes and the cash received (excluding cash received with respect to accrued and unpaid interest, which will be treated as interest).

The issue price of the New Notes is equal to 85.5% percent of their face amount. The issue price was determined based on the average of trades for the New Notes on December 11, 2025, the first day on which trades were reported for the New Notes on FINRA’s Trade Reporting and Compliance Engine (TRACE). The Issuer’s determination of issue price is binding on a holder unless the holder explicitly discloses a contrary position on its federal income tax return. Participating Holders should consult their tax advisors to determine the tax consequences of the Exchanges to them.

Form 8937, Part II, Line 16

If an Exchange is not a recapitalization, a Participating Holder will recognize gain or loss upon the exchange of Existing Notes of a particular series for New Notes. In that event, a holder generally will have an initial tax basis in the New Notes equal to their issue price.

If an Exchange represents a recapitalization, a Participating Holder will have a tax basis in the New Notes received in the Exchange equal to the tax basis of the Existing Notes surrendered in the Exchange (excluding basis attributable to accrued, unpaid interest), increased by any gain recognized in the Exchange, and decreased by any cash received in the Exchange (excluding any cash attributable to accrued, unpaid interest).

Participating Holders should consult their tax advisors to determine the tax consequences of the Exchanges to them.

Form 8937, Part II, Line 17

Sections 354, 358, 368, 1001, 1012 and 1273.

Form 8937, Part II, Line 18

To the extent an Exchange is not a recapitalization, the Exchange may result in a loss to a Participating Holder to the extent such holder's tax basis in the Existing Notes of a particular series surrendered (excluding any accrued, unpaid interest) exceeds the sum of the cash received and the issue price of the New Notes received in exchange therefor. The Exchange generally should not result in a loss to Participating Holders to the extent the Exchange is a nontaxable recapitalization.

Participating Holders should consult their tax advisors to determine the tax consequences of the Exchanges to them.