

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 lender's specific circumstances. Lenders are urged to consult their own tax advisors regarding U.S. tax consequences of the amendments described herein and the impact to tax basis resulting from the amendments.

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

Form 8937, Part I, Line 10

See below.

Form 8937, Part II, Line 14

On December 9, 2025, Sabre GLBL Inc. (the “Issuer” or the “Company”), a wholly owned subsidiary of Sabre Corporation, exchanged a portion of its existing senior secured term loans (the “Existing Term Loans”) for two new tranches of senior secured term loans (the “New Term Loans”). The exchange (the “Term Loan B Amendments”) had the effect of extending the maturity date and repricing the interest rate on approximately \$347 million of Existing Term Loans. The Term Loan B Amendments were entered into pursuant to, respectively, the Tenth Amendment and Eleventh Amendment, each dated as of December 9, 2025, to the Company’s existing Amended and Restated Credit Agreement.

Following is a summary of the Existing Term Loans that were exchanged pursuant to the Term Loan B Amendments:

Existing Term Loan	CUSIP	Interest Rate¹	Maturity Date	Mandatory Prepayments from Excess Cash Flows²
2021 Other Term B-2 Loan	78571YBF6	SOFR + 3.50%	12/17/2027	Yes
2022 Term B Loan	78571YBH2	SOFR + 4.25%	6/30/2028	Yes
2022 Term B-2 Loan	78571YBJ8	SOFR + 5.00%	6/30/2028	Yes
2021 Other Term B-1 Loan	78571YBG4	SOFR + 3.50%	12/17/2027	No ³

¹ These rates also include a credit spread adjustment to SOFR that is not included in the table above.

² The Company’s Credit Agreement requires mandatory prepayments from a percentage of excess cash flows for certain tranches of term loans. The prepayment provision applies to most tranches of term loans, including the 2021 Other Term B-2 Loan, 2022 Term B Loan, and 2022 Term B-2 Loan.

³ The Company’s Credit Agreement does not require mandatory prepayments from excess cash flows with respect to the 2021 Other Term B-1 Loan.

Participating lenders that exchanged Existing Term Loans pursuant to the Term Loan B Amendments received a principal amount of New Term Loans based on the exchange ratios described in the following table.

Existing Term Loans	Principal Amount of Existing Term Loans Exchanged	New Term Loans Issued in the Exchange	Exchange Ratio per \$100 Principal of Existing Term Loans	Principal Amount of New Term Loans Issued in the Exchange
2021 Other Term B-2 Loan	\$62,498,503	2025 Other Term B-1 Loan	\$110.00	\$68,748,354
2022 Term B Loan	\$82,801,867	2025 Other Term B-1 Loan	\$106.50	\$88,183,989
2022 Term B-2 Loan	\$123,293,418	2025 Other Term B-1 Loan	\$106.50	\$131,307,490
2021 Other Term B-1 Loan	\$78,872,879	2025 Other Term B-2 Loan	\$110.00	\$86,760,167
TOTAL	\$347,466,668		TOTAL	\$375,000,000

Participating lenders also received a cash payment for accrued and unpaid interest on the Existing Term Loans exchanged for the New Term Loans.

The New Term Loans

The New Term Loans consist of two tranches of term loans: (1) the 2025 Other Term B-1 Loan and (2) the 2025 Other Term B-2 Loan.⁴ Both tranches of the New Term Loans bear interest at term SOFR (adjusted for a credit spread adjustment, or “CSA,” of 10 basis points), plus an applicable margin of 625 bps, or at a base rate, plus an applicable margin of 525 basis points. The stated maturity date of the New Term Loans is July 30, 2029. Except for the extended maturity date and new interest rate, the New Term Loans have substantially similar terms as the Existing Term Loans, including guarantees and security interests.

⁴ The Company issued two tranches of New Term Loans in order to preserve the provisions of the Existing Term Loans regarding mandatory prepayments from excess cash flows.

Following is a summary of the terms of the New Term Loans:

New Term Loans	CUSIP	Principal Amount	Interest Rate	Maturity Date	Mandatory Prepayments from Excess Cash Flows
2025 Other Term B-1 Loan	78571YBM1	\$288,239,833	SOFR + 6.25%	7/30/2029	YES
2025 Other Term B-2 Loan	78571YBN9	\$86,760,167	SOFR + 6.25%	7/30/2029	NO
	TOTAL	\$375,000,000			

The Company determined that the Term Loan B Amendments represented a significant modification of each tranche of the Existing Term Loans under Treas. Reg. § 1.1001-3, so that a participating lender that exchanged an Existing Term Loan for a New Term Loan would be treated as engaging in an exchange for purposes of section 1001 and Treas. Reg. § 1.1001-1(a).

Form 8937, Part II, Line 15

This Form 8937 addresses the tax consequences of the Term Loan B Amendments to an existing lender that participated in the transaction. Existing lenders that participated in the Term Loan B Amendments are referred to as the “Existing Lenders.” The exchange of an Existing Term Loan for a New Term Loan pursuant to the Term Loan B Amendments is referred to as the “Exchange.”

The tax consequences of the Exchange to an Existing Lender will depend on whether the loan surrendered and the loan received therefor represent “securities” for purposes of the rules providing for nontaxable recapitalizations under section 368(a)(1)(E). If an Existing Term Loan surrendered and a New Term Loan received therefor are considered securities, the Exchange would qualify as a recapitalization (excluding cash received with respect to accrued and unpaid interest, which will be treated as an interest payment). If the Exchange is considered a recapitalization, an Existing Lender will not recognize a loss, but will recognize gain, if any, equal to the lesser of (i) the amount of “boot” received and (ii) the gain realized, which is equal to the amount realized over the adjusted tax basis of the Existing Term Loan surrendered in the Exchange (excluding any basis attributable to accrued and unpaid interest). The amount realized is the issue price of the New Term Loan received in the Exchange. The amount of boot is equal to the fair market value (*i.e.*, issue price) of any excess of the principal amount of the New Term Loan received over the principal amount of the Existing Term Loan surrendered.

If the Exchange does not qualify as a recapitalization, an Existing Lender will recognize gain or loss in the Exchange, and the lender’s tax basis in the New Term Loan received in the Exchange will be equal to the issue price.

The issue price of each New Term Loan is described below:

New Term Loan	CUSIP	Issue Price
2025 Other Term B-1 Loan	78571YBM1	102.25
2025 Other Term B-2 Loan	78571YBN9	102.25

The issue price was determined based on the midpoint of bid/ask quotes for each of the New Term Loans on December 11, 2025, the first day on which quotes were available on Bloomberg's loan pricing service. The Company's determination of issue price is binding on a lender unless the lender explicitly discloses a contrary position on its federal income tax return. Lenders should consult their tax advisors to determine the tax consequences of the Exchange to them.

Form 8937, Part II, Line 16

If the Exchange represents a recapitalization, an Existing Lender will have an aggregate tax basis in the New Term Loans received in the Exchange equal to the aggregate tax basis of the Existing Term Loans surrendered in the Exchange (excluding basis attributable to any accrued and unpaid interest), increased by any gain recognized in the Exchange.

To the extent the Exchange is not a recapitalization, an Existing Lender will recognize gain or loss upon the exchange of Existing Term Loans for New Term Loans. In that event, the lender's tax basis in New Term Loans received in the Exchange will equal the issue price thereof.

Lenders should consult their tax advisors to determine the tax consequences of the Exchange to them.

Form 8937, Part II, Line 17

Sections 354, 356, 358, 368, 1001, 1012 and 1273.

Form 8937, Part II, Line 18

The Exchange generally should not result in a loss to Existing Lenders to the extent the transaction is a nontaxable recapitalization. To the extent the Exchange is not a recapitalization, the transaction may result in a loss to an Existing Lender to the extent such lender's tax basis in the loan surrendered (excluding any basis attributable to accrued and unpaid interest) exceeds the issue price of the new loan received in exchange therefor.

Lenders should consult their tax advisors to determine the tax consequences of the Exchange to them.