

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 ▶ 5/3/2024

Print your name ▶ SCOTT COCKRELL Title ▶ VP TAX

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	STEVEN DODSON		5/3/2024		P01280405
	Firm's name ▶ DELOITTE TAX LLP			Firm's EIN ▶	86-1065772
	Firm's address ▶ 2200 ROSS AVENUE, SUITE 1600, DALLAS, TX 75201			Phone no.	214-840-1088

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 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 March 19, 2024 (the "Settlement Date"), Sabre GLBL Inc. (the "Issuer" or the "Company") settled a privately negotiated exchange agreement to exchange its 4.000% Exchangeable Senior Notes due 2025 (the "Existing Notes") for cash and the Company's newly issued 7.32% Exchangeable Senior Notes due 2026 (the "New Notes"). The following is a summary of the Existing Notes that were surrendered in the exchange on the Settlement Date (the "Exchange"):

	CUSIP	Principal Amount Exchanged	Interest Rate	Maturity
Existing Notes	78573NAE2 (144A)	\$150,000,000	4.000%	4/15/2025

Pursuant to the Exchange, \$150 million of Existing Notes were exchanged by the Company on the Settlement Date for an equal principal amount of New Notes plus approximately \$32.6 million of cash, with such cash representing the premium paid for the Existing Notes in excess of par value and accrued and unpaid interest on the Existing Notes. As such, a holder received the following consideration for each \$1,000 principal amount of Existing Notes surrendered: (i) cash equal to \$200, (ii) cash with respect to accrued and unpaid interest, and (iii) \$1,000 principal amount of New Notes. The primary effect of the Exchange was to extend the maturity date, set the initial exchange rate to 222.2222 shares of Sabre Corporation's common stock ("Common Stock") per \$1,000 principal amount of New Notes, and change the interest rate to 7.32% per annum.

Interest on the New Notes is payable in cash semiannually at a rate of 7.32% per annum. The New Notes will mature on August 1, 2026 (the "Maturity Date"), unless earlier repurchased or exchanged. Before February 1, 2026, holders have the right to exchange their New Notes upon the occurrence of certain events. From and after February 1, 2026, holders may exchange their New Notes at any time at their election until the close of business on the second scheduled trading day immediately before the Maturity Date. The Company will have the right to elect to settle exchanges in cash, shares of Common Stock or a combination of cash and Common Stock at the Company's election. The following is a summary of the terms of the New Notes:

	CUSIP	Principal Amount	Interest Rate	Maturity
New Notes	78573NAK8 (144A)	\$150,000,000	7.32%	8/1/2026

Form 8937, Part II, Line 15

The following summary of certain U.S. federal income tax consequences is for informational purposes only and is not a substitute for tax advice based upon your individual circumstances. All holders are urged to consult their individual tax advisors for the U.S. federal, state, local, and other tax consequences applicable related to the Exchange.

The discussion below is limited to a holder that is a “United States person,” as defined in Section 7701(a)(30) of the Internal Revenue Code (each, a “U.S. Holder”). Additionally, the discussion below assumes that each U.S. Holder is an original purchaser of the Existing Notes and holds the Existing Notes as capital assets.

Effect on Basis to U.S. Holders

The Issuer intends to treat the Exchange as a significant modification (i.e., a debt-for-debt exchange) under Treas. Reg. § 1.1001-3. The tax consequences of the Exchange to a U.S. Holder will depend on whether the Existing Notes 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 the Existing Notes and the New Notes constitute “securities,” the Exchange should be treated as a nontaxable recapitalization under section 368(a)(1)(E). To the extent that either the Existing Notes or New Notes are not securities, the Exchange does not qualify as a nontaxable recapitalization.

If an Exchange is a recapitalization, then a U.S. Holder would not recognize a loss on an Exchange, but would recognize gain equal to the lesser of (i) the amount of cash received (excluding any cash paid with respect to accrued interest or in lieu of fractional New Notes), plus the fair market value of the New Notes received, over the U.S. Holder’s tax basis in the Existing Notes, and (ii) the amount of cash received (excluding any cash paid with respect to accrued interest or in lieu of fractional New Notes). Generally, the fair market value of the New Notes is the issue price, which is 81.91% of par.

If, however, an Exchange does not qualify as a recapitalization within the meaning of section 368(a)(1)(E), a U.S. Holder would recognize gain or loss equal to the difference between (1) the sum of the cash received

and the fair market value of the New Notes received in the Exchange and (2) the Holder's basis in the Existing Notes surrendered in the Exchange.

To the extent that cash was received for any fractional New Notes, a U.S. Holder would be treated as though the fractional New Note had been issued and then redeemed for cash. The receipt of cash in lieu of a fractional New Note generally would result in capital gain or loss (measured by the difference between the cash received in lieu of the fractional New Note and the U.S. Holder's tax basis in the fractional New Note). The U.S. Holder's tax basis in a fractional New Note would be determined by allocating the tax basis in the New Notes received in the Exchange (including any fractional New Notes) using relative fair market values.

Form 8937, Part II, Line 16

If the Exchange is not a recapitalization, a U.S. Holder will recognize gain or loss upon the exchange of the Existing Notes for the New Notes. In that event, a holder generally will have an initial tax basis in a New Note received pursuant to the Exchange equal to its issue price.

If the Exchange represents a recapitalization, a U.S. Holder will have a tax basis in the New Notes received in the Exchange equal to the tax basis of the notes surrendered in the Exchange, increased by any gain recognized in the Exchange, and reduced by any cash received in the Exchange (excluding any cash received with respect to accrued, unpaid interest).

U.S. Holders should consult their tax advisors to determine the tax consequences of the Exchange 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 the Exchange is not a recapitalization, the Exchange may result in a loss to a U.S. Holder to the extent such holder's tax basis in the Existing Notes surrendered exceeds the sum of any cash received and the issue price of the New Notes received in exchange therefor. The Exchange generally should not result in a loss to U.S. Holders to the extent the Exchange is a nontaxable recapitalization.

U.S. Holders should consult their tax advisors to determine the tax consequences of the Exchange to them.