# Form 8937

## Report of Organizational Actions Affecting Basis of Securities

*OMB No. 1545-0123*

### Part I  Reporting Issuer

1. **Issuer’s name**
   - Broadcom Inc.
2. **Issuer’s employer identification number (EIN)**
   - 35-2617337
3. **Name of contact for additional information**
   - Beatrice Russotto
4. **Telephone No. of contact**
   - 408-433-8000
5. **Email address of contact**
   - investor.relations@broadcom.com
6. **Number and street (or P.O. box if mail is not delivered to street address) of contact**
   - 1320 Ridder Park Drive
7. **City, town, or post office, state, and ZIP code of contact**
   - San Jose, CA 95131
8. **Date of action**
   - May 21, 2020 & June 4, 2020
9. **Classification and description**
   - See Attachment (Line 14)
10. **CUSIP number**
    - See Attachment (Line 14)
11. **Serial number(s)**
    - See Attachment (Line 14)
12. **Ticker symbol**
    - AVGO
13. **Account number(s)**

### 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.

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 ◀ Ivy Pong Date ◀ 01/14/2021

Print your name ◀ Ivy Pong Title ◀ VP Tax

Paid Preparer Use Only

Print/Type preparer’s name ◀ Ken Hill
Preparer’s signature ◀
Date ◀ 01/14/2021
Check □ if self-employed
PTIN ◀ P00561909

Firm’s name ◀ Deloitte Tax LLP
Firm’s EIN ◀ 86-1065772
Firm’s address ◀ 225 West Santa Clara St., Suite 600, San Jose, CA 95113
Phone no. 408-704-4000

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054
Current Internal Revenue Service ("IRS") guidance under Internal Revenue Code ("IRC") section 6045B provides that if a company undertakes an organizational action that affects the basis of a specified security an information return on Form 8937 must be filed with the IRS and furnished to affected holders, or alternatively, posted on the company’s website.

The information contained in the Form 8937 and this attachment is intended to satisfy those requirements and is intended to provide a general summary of certain U.S. federal income tax consequences of the Exchanges (defined below). This information does not constitute tax advice and does not purport to take into account any holder’s specific circumstances. Holders are urged to consult their own tax advisors regarding U.S. tax consequences of the adjustments described herein and the impact to tax basis resulting from the adjustments.
Form 8937, Part II, Line 14

Pursuant to an Offering Memorandum dated May 5, 2020, Broadcom Inc. (the “Company”) entered into exchanges (the “Exchanges”) with holders of certain notes of the Company and two of its affiliates, Broadcom Corporation (“Broadcom Corporation”) and CA, Inc. (“CA”). The Exchanges closed on May 21, 2020 and June 4, 2020. Capitalized terms not defined herein shall have the meanings ascribed to them in the Offering Memorandum.

The Exchanges involved the series of notes listed in the table below (collectively the “Existing Notes”) for a new series of Company 3.459% Senior Notes, due 9/15/2026 (the “New 2026 Notes”) or a new series of Company 4.11% Senior Notes, due 9/15/2028 (the “New 2028 Notes” and, together with the New 2026 Notes, the “New Notes”). For each $1,000 principal amount of each series of Existing Notes validly tendered and accepted for exchange by the Company, the table sets forth the Total Consideration (subject to rounding and cash in lieu of fractional amounts of New Notes) received by holders.

<table>
<thead>
<tr>
<th>CUSIP Numbers</th>
<th>Existing Notes</th>
<th>Issuer</th>
<th>Total Consideration</th>
<th>Payable in New Notes/CUSIP</th>
</tr>
</thead>
<tbody>
<tr>
<td>11134LAJ8 U1108LAE9 11134LAK5</td>
<td>2.2% Senior Notes, due 1/15/2021</td>
<td>Broadcom Corporation</td>
<td>$1,009.20</td>
<td>New 2026 Notes 11135FAM3</td>
</tr>
<tr>
<td>11135FAA9 U1109MAA4</td>
<td>3.125% Senior Notes, due 4/15/2021</td>
<td>Broadcom Inc.</td>
<td>$1,019.19</td>
<td>New 2026 Notes 11135FAM3</td>
</tr>
<tr>
<td>11134LAC3 U1108LAB5 11134LAD1</td>
<td>3.0% Senior Notes, due 1/15/2022</td>
<td>Broadcom Corporation</td>
<td>$1,030.58</td>
<td>New 2026 Notes 11135FAM3</td>
</tr>
<tr>
<td>12673PAH8</td>
<td>3.6% Senior Notes, due 8/15/2022</td>
<td>CA</td>
<td>$1,042.59</td>
<td>New 2026 Notes 11135FAM3</td>
</tr>
<tr>
<td>11135FAC5 U1109MAC0</td>
<td>3.125% Senior Notes, due 10/15/2022</td>
<td>Broadcom Inc.</td>
<td>$1,042.33</td>
<td>New 2026 Notes 11135FAM3</td>
</tr>
<tr>
<td>11134LAE9 U1108LAC3 11134LAF6</td>
<td>3.625% Senior Notes, due 1/15/2024</td>
<td>Broadcom Corporation</td>
<td>$1,052.38</td>
<td>New 2028 Notes 11135FAK7</td>
</tr>
<tr>
<td>11135FAD3 U1109MAD8</td>
<td>3.625% Senior Notes, due 10/15/2024</td>
<td>Broadcom Inc.</td>
<td>$1,062.23</td>
<td>New 2028 Notes 11135FAK7</td>
</tr>
</tbody>
</table>

The Total Consideration includes an Early Participation Payment of $50 (payable in applicable New Notes) for each $1,000 principal amount of each series of Existing Notes validly tendered at or prior to the Early Participation Date and accepted for exchange.
No fractional New Notes were issued. Instead, New Notes to be received by a holder were rounded downward to the nearest integral multiple of $1,000 and the difference (that is, the fractional New Note) was paid in cash.

For each $1,000 principal amount of Existing Notes validly tendered and accepted for exchange by the Company, holders of such Existing Notes also received cash payment for accrued and unpaid interest on the applicable series of Existing Notes up to, but not including, the Early Settlement Date, as well as a cash payment due in lieu of fractional amounts of New Notes.

**Form 8937, Part II, Line 15**

*Taxable Exchange Treatment for Existing Notes other than Company Existing 2024 Notes (defined below)*

The Company intends to treat the Exchanges of Existing Notes (other than Company Existing 2024 Notes) for New Notes pursuant to the Exchange Offers as taxable dispositions of such Existing Notes for U.S. federal income tax purposes resulting from a “significant modification” of the Existing Notes.

Accordingly, a holder generally will recognize gain or loss upon the exchange of Existing Notes (other than Company Existing 2024 Notes) for New Notes and cash (if any) in an amount equal to the difference between (i) the sum of (A) the amount of such cash plus (B) the issue price of such New Notes as determined for U.S. federal income tax purposes (See Line 16 below) and (ii) such holder’s adjusted tax basis in such Existing Notes. The amount realized does not include the consideration, if any, attributable to accrued but unpaid interest on the Existing Notes.

*Tax-Free Recapitalization Treatment of the Company’s 3.625% Senior Notes, due 10/15/2024 (the “Company Existing 2024 Notes”)*

The exchange of Existing Notes for New Notes generally would constitute a “recapitalization,” within the meaning of Section 368(a)(1)(E) of the Code if both the New Notes and the Existing Notes exchanged therefor constitute “securities” issued by the same issuer for U.S. federal income tax purposes.

The Company intends to take the position that the Company Existing 2024 Notes and the New 2028 Notes are securities for U.S. federal income tax purposes. Thus, the exchange of Company Existing 2024 Notes for New 2028 Notes is intended to qualify as a recapitalization within the meaning of Section 368(a)(1)(E) of the Code.
The Company intends to take the position that the Company’s 3.125% Senior Notes, due 4/15/2021 and the Company’s 3.125% Senior Notes, due 10/15/2022 (together, the “Company Existing Other Notes”) are not securities for U.S. federal income tax purposes. Thus, the exchange of Company Existing Other Notes for New Notes would not constitute a recapitalization for U.S. federal income tax purposes. In addition, the exchange of Existing Notes (other than Company Existing 2024 Notes and Company Existing Other Notes) for New Notes cannot constitute a recapitalization because the exchange results in a change of issuer.

Each holder should consult its tax advisor regarding whether to treat the exchange of Company Existing 2024 Notes or Company Existing Other Notes for New Notes pursuant to the Exchange Offers as a recapitalization.

Accordingly, a holder of Company Existing 2024 Notes that exchanged such Company Existing 2024 Notes for New 2028 Notes should recognize any gain (but not loss) realized on the exchange (subject to the discussion below regarding the Early Participant Payment) in an amount equal to the lesser of:

- the excess, if any, of (i) the issue price of the New 2028 Notes (including any fractional New Notes which are deemed redeemed for cash) received by such holder, over (ii) such holder’s adjusted tax basis in such Company Existing 2024 Notes; or

- the fair market value of the excess, if any, of (A) the aggregate principal amount of the New 2028 Notes (including any fractional New Notes which are deemed redeemed for cash) received by such holder over (B) the aggregate principal amount of the Company Existing 2024 Notes exchanged therefor (such excess, the “Excess Principal Amount”). Holders should consult their tax advisors regarding the determination of the fair market value of any Excess Principal Amount.

Cash in Lieu of Fractional New Notes

The Company intends to treat a holder that received cash in lieu of a fractional New Note as having received the aggregate amount of New Notes to which such holder otherwise would have been entitled and then having disposed of such fractional New Note for such cash. Such holder should recognize gain or loss on such disposition.

Early Participant Payment

The U.S. federal income tax treatment of the receipt of the Early Participant Payment is unclear. The Company intends to take the position that the Early Participant Payment is part of the consideration for tendered Existing Notes which would generally be taken into account in determining such holder’s gain or loss on the exchange of such Existing Notes as described
above. **Holders should consult their tax advisors regarding the U.S. federal income tax treatment of the Early Participant Payment.**

**Form 8937, Part II, Line 16**

*Basis of New Notes Received in Taxable Exchanges*

A holder’s basis in the New Notes received in taxable Exchanges will be equal to the “issue price” (which represents their fair market value) of the New Notes.

The Company has determined the value of the 2026 Notes to be 101% of face and the value of the 2028 Notes to be 103.25% of face, which is the approximate average of trades reported on FINRA’s Trade Reporting and Compliance Engine on the first available trade date for each respective instrument.

*Basis of New Notes Received in the Recapitalization*

A holder’s initial tax basis in the portion of the New 2028 Notes (including any fractional New Notes which are deemed redeemed for cash) received in the Recapitalization with a principal amount less than or equal to the principal amount of the Company Existing 2024 Notes exchanged by such holder generally will be equal to such holder’s adjusted tax basis in the Company Existing 2024 Notes exchanged therefor (i) reduced by the fair market value of any Excess Principal Amount of New Notes received with respect to such tendered Company Existing 2024 Notes and (ii) increased by the amount of any gain recognized by such holder in the exchange of such Company Existing 2024 Notes. Such holder’s initial tax basis in the Excess Principal Amount of New Notes (including any fractional New Notes which are deemed redeemed for cash), if any, will be equal to the fair market value of the Excess Principal Amount on the applicable Settlement Date. As a result, a holder exchanging Company Existing 2024 Notes for New 2028 Notes may have a split basis and holding period in its New 2028 Notes.

**Form 8937, Part II, Line 17**

Section 1001, Treas. Reg. § 1.1273-2(c), Treas. Reg. § 1.1273-2(f) (Exchanges of Existing Notes other than Company Existing 2024 Notes)

Sections 368(a)(1)(E), 354(a), 356(a), 356(d) (Recapitalization of Company Existing 2024 Notes)

Section 1001 (cash in lieu of fractional New Notes)
Form 8937, Part II, Line 18

A holder may recognize gain or loss on the Exchanges of Existing Notes other than Company Existing 2024 Notes.

No loss may be recognized by a holder on the Recapitalization of Company Existing 2024 Notes.

A holder may recognize gain or loss on the receipt of cash in lieu of fractional New Notes.

Form 8937, Part II, Line 19

The reportable tax year for the Exchanges is the tax year during which the Exchanges occurred (i.e., 2020 for a calendar year taxpayer).
Pursuant to an Offering Memorandum dated May 5, 2020, Broadcom Inc. (the “Company”) entered into exchanges (the “Exchanges”) with holders of certain notes of the Company and its affiliates. The Exchanges involved the following series of notes: (1) Broadcom Corporation’s 2.2% Senior Notes due 1/15/2021, (2) the Company’s 3.125% Senior Notes due 4/15/2021, (3) Broadcom Corporation’s 3% Senior Notes due 1/15/2022, (4) CA, Inc.’s 3.6% Senior Notes due 8/15/2022, (5) the Company’s 3.125% Senior Notes due 10/15/2022, (6) Broadcom Corporation’s 3.625% Senior Notes due 1/15/2024, and (7) the Company’s 3.625% Senior Notes due 10/15/2024 (collectively the “Existing Notes”).

The Company consummated the Exchanges on May 21, 2020 and June 4, 2020, whereby the Company exchanged approximately $3.7 billion in aggregate principal of the Existing Notes, for approximately $3.9 billion million in aggregate principal of (1) 3.459% Senior Notes due September 15, 2026 (“the 2026 Notes”) and (2) 4.11% Senior Notes due September 15, 2028 issued by the Company (the “2028 Notes” and collectively with the 2026 Notes, the “New Notes”). The terms of the New Notes are summarized below:

<table>
<thead>
<tr>
<th>New Note</th>
<th>CUSIP</th>
<th>Maturity Date</th>
<th>Principal Amount</th>
<th>Issue Price (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>The 2026 Notes</td>
<td>11135FAM3</td>
<td>15-Sep-2026</td>
<td>$1.695 billion</td>
<td>101.00%</td>
</tr>
<tr>
<td>The 2028 Notes</td>
<td>11135FAK7</td>
<td>15-Sep-2028</td>
<td>$2.222 billion</td>
<td>103.25%</td>
</tr>
</tbody>
</table>

The New Notes are “traded on an established market” within the meaning of Treas. Reg. § 1.1273-2(f)(1). The Company has determined the value of the 2026 Notes to be 101% of face and the value of the 2028 Notes to be 103% of face, which is the approximate average of trades reported on FINRA’s Trade Reporting and Compliance Engine (TRACE) on the first available trade date for each respective instrument. The New Notes are considered “publicly traded property” within the meaning of Treas. Reg. § 1.1273-2(c); therefore, the issue price of the New Notes is the fair market value of such publicly traded property (i.e., the trading price).