

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.

Sign Here

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 ▶  Date ▶ 5/8/2020

Print your name ▶ Ivy Pong Title ▶ VP, Global Taxation

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Raffi Baroutjian		5/7/2020		P01383238
	Firm's name ▶ Deloitte Tax LLP			Firm's EIN ▶	86-1065772
	Firm's address ▶ 30 Rockefeller Plaza, New York, NY 10112			Phone no.	212-492-4000

Broadcom Inc.
EIN 35-2617337
Attachment to Form 8937
Report of Organizational Actions Affecting Basis of Securities
8.00% Mandatory Convertible Preferred Stock, Series A, \$0.001 Par Value

Current Internal Revenue Service (“IRS”) guidance under Internal Revenue Code (“IRC”) section 6045B provides that if a company pays a cash dividend with respect to one class of stock that results in a conversion rate adjustment on another class of stock that is treated as a deemed stock distribution, 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 conversion rate adjustments. 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 the fair market value of the stock distribution, the U.S. tax consequences of the adjustments described herein, and the impact to tax basis resulting from the adjustments.

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Form 8937, Part II, Line 14

On September 30, 2019, Broadcom Inc. (“**Company**”) issued 8.00% Mandatory Convertible Preferred Stock, Series A (“**MCP Stock**”). Pursuant to the Certificate of Designations, dated as of September 30, 2019 (“**Certificate**”), each share of MCP Stock is convertible into a number of Broadcom common shares (“**Common Stock**”) between the Minimum Conversion Rate and the Maximum Conversion Rate (as defined in the Certificate) (“**Conversion Rates**”), subject to anti-dilution protections, including an adjustment for certain cash distributions made on the Common Stock, and other adjustments. Under the terms of the Certificate, however, adjustments to the Conversion Rates are not required unless they would result in an increase or decrease of at least 1% (per instance or cumulatively) (“**1% Threshold**”). Adjustments that are not made due to the 1% Threshold are carried forward.

On March 31, 2020, the Company paid a cash dividend of \$3.25 per share of Common Stock (“**Cash Dividend**”) to stockholders of record as of March 23, 2020 (“**Record Date**”). Although the adjustments to the Conversions Rates were below the 1% Threshold, the Company adjusted the Conversion Rates of the MCP Stock immediately after the close of business on the Record Date for the Cash Dividend and in recognition of carried-forward adjustments relating to a cash dividend of \$3.25 per share of Common Stock paid on December 31, 2019, which adjustments were deferred under the Certificate (“**Conversion Rate Adjustment**”).

Form 8937, Part II, Line 15

For U.S. federal income tax purposes, the Company expects the Conversion Rate Adjustment of the MCP Stock to be treated as a taxable stock dividend under sections 305(c) and 301(b). As a result, a holder’s tax basis in each share of MCP Stock should be increased under section 301(d). The date of the Conversion Rate Adjustment is March 23, 2020, and the tax basis increase per share of MCP Stock is, (i) if using the adjustment to the Minimum Conversion Rate, \$3.6933, or (ii) if using the adjustment to the Maximum Conversion Rate, \$4.2926.

Form 8937, Part II, Line 16

In general, a deemed distribution of stock of a corporation is treated as a distribution of property to which section 301 applies by reason of section 305(b)-(c).

One reasonable method to determine the fair market value of a deemed distribution is to multiply the conversion rate adjustments by the share prices that were used in the calculation of those conversion rate adjustments.

The portions of the Conversion Rate Adjustment attributable to the dividend of Common Stock paid on December 31, 2019 were calculated using a stock price of \$322.8534, representing the average VWAP per share of Common Stock over the five consecutive trading day period ending

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on, and including, December 19, 2019. The portions of the Conversion Rate Adjustment attributable to the dividend of Common Stock paid on March 31, 2020 were calculated using a stock price of \$193.0184, representing the average VWAP per share of Common Stock over the five consecutive trading day period ending on, and including, March 19, 2020.

The prior Minimum Conversion Rate was 3.0303 shares of Common Stock per share of MCP Stock and the prior Maximum Conversion Rate was 3.5422 shares of Common Stock per share of MCP Stock. Pursuant to Section 13(a)(v) of the Certificate, (i) the Minimum Conversion Rate was adjusted to 3.0456 shares of Common Stock per share of MCP Stock and (ii) the Maximum Conversion Rate was adjusted to 3.5600 shares of Common Stock per share of MCP Stock. As a result, the adjustment to the Minimum Conversion Rate corresponds to 0.0153 shares of Common Stock per share of MCP Stock, and the adjustment to the Maximum Conversion Rate corresponds to 0.0178 shares of Common Stock per share of MCP Stock.

The portions of the basis adjustments attributable to the dividend of Common Stock paid on December 31, 2019 were \$1.8403 for the Minimum Conversion Rate and \$2.1308 for the Maximum Conversion Rate. The portions of the basis adjustments attributable to the dividend of Common Stock paid on March 31, 2020 were \$1.8530 for the Minimum Conversion Rate and \$2.1618 for the Maximum Conversion Rate.

Form 8937, Part II, Line 17

Sections 301(a); 301(b), (c)(1), (d); 305(b), (c); and Prop. Reg. § 1.305-7(c), (g).

Form 8937, Part II, Line 18

This is not a loss transaction.

Form 8937, Part II, Line 19

The stock basis adjustment is taken into account in the tax year of the holder during which the Conversion Rate Adjustment occurred (e.g., 2020 for calendar year taxpayers).