



**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.

Blank lines for listing Internal Revenue Code sections.

18 Can any resulting loss be recognized? ▶ See attachment.

Blank lines for providing information on resulting loss recognition.

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

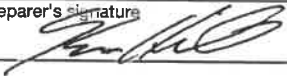
Blank lines for providing other necessary information.

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 ▶ 11/12/21

Print your name ▶ Ivy Pong Title ▶ VP Tax

<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Ken Hill		11/12/2021		P00561909
	Firm's name ▶ Deloitte Tax LLP	Firm's address ▶ 225 West Santa Clara St., Suite 600, San Jose, CA 95113		Firm's EIN ▶	86-1065772
				Phone no.	408-704-4000

**Broadcom Inc.**  
**EIN 35-2617337**  
**Attachment to Form 8937**  
**Report of Organizational Actions Affecting Basis of Securities**  
**Exchanges of Existing Notes for New Notes**  
**Occurring on September 30, 2021**

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.

**Broadcom Inc.**  
**EIN 35-2617337**  
**Attachment to Form 8937**  
**Report of Organizational Actions Affecting Basis of Securities**  
**Exchanges of Existing Notes for New Notes**  
**Occurring on September 30, 2021**

**Form 8937, Part II, Line 14**

Pursuant to an Offering Memorandum dated September 13, 2021, Broadcom Inc. (the “**Company**”) entered into exchanges (the “**Exchanges**”) with holders of certain notes of the Company and one of its affiliates, Broadcom Corporation (“**Broadcom Corporation**”). The Exchanges closed on September 30, 2021. 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 3.137% Senior Notes, due 11/15/2035 (the “**New 2035 Notes**”) or a new series of Company 3.187% Senior Notes, due 11/15/2036 (the “**New 2036 Notes**”) and, together with the New 2035 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.

<b>CUSIP Numbers</b>	<b>Existing Notes</b>	<b>Issuer</b>	<b>Total Consideration</b>	<b>Payable in New Notes/CUSIP</b>
11134LAP4	3.125% Senior Notes, due 1/15/2025	Broadcom Corporation	\$1,065.92	New 2035 Notes 11135FBP5
11135FBC4	4.700% Senior Notes, due 4/15/2025	Broadcom Inc.	\$1,117.21	New 2035 Notes 11135FBP5
11135FAT8 U1109MAM8 11135FBB6	3.150% Senior Notes, due 11/15/2025	Broadcom Inc.	\$1,073.51	New 2035 Notes 11135FBP5
11135FAE1 U1109MAE6 11135FAZ4	4.250% Senior Notes, due 4/15/2026	Broadcom Inc.	\$1,119.28	New 2035 Notes 11135FBP5
11135FAN1	3.459% Senior Notes due 9/15/2026	Broadcom Inc.	\$1,086.48	New 2035 Notes 11135FBP5
11134LAG4 U1108LAD1 11134LAH2	3.875% Senior Notes due 1/15/2027	Broadcom Corporation	\$1,105.78	New 2035 Notes 11135FBP5
12673PAJ4	4.700% Senior Notes due 3/15/2027	CA, Inc.	\$1,134.10	New 2035 Notes 11135FBP5
11135FAK7 U1109MAH9 11135FAL5	4.110% Senior Notes due 9/15/2028	Broadcom Inc.	\$1,126.04	New 2035 Notes 11135FBP5
11134LAQ2 U1108LAH2 11134LAR0	3.500% Senior Notes due 1/15/2028	Broadcom Corporation	\$1,094.69	New 2036 Notes 11135FBQ3

**Broadcom Inc.**  
**EIN 35-2617337**  
**Attachment to Form 8937**  
**Report of Organizational Actions Affecting Basis of Securities**  
**Exchanges of Existing Notes for New Notes**  
**Occurring on September 30, 2021**

11135FAH4 U1109MAG1 11135FBD2	5.000% Senior Notes due 4/15/2030,	Broadcom Inc.	\$1,187.26	New 2036 Notes 11135FBQ3
11135FAB7 U1109MAB2 11135FBA8	4.750% Senior Notes due 4/15/2029	Broadcom Inc.	\$1,164.57	New 2036 Notes 11135FBQ3
11135FAP6 U1109MAK2 11135FAQ4	4.150% Senior Notes due 11/15/2030	Broadcom Inc.	\$1,127.46	New 2036 Notes 11135FBQ3

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.

In addition, for each \$1,000 principal amount of Existing Notes validly tendered and accepted for exchange by the Company, holders of such Existing Notes received a cash payment for accrued and unpaid interest on the applicable series of Existing Notes up to, but not including, the Early Settlement Date.

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

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

The Company intends to treat the Exchanges of Existing Notes for New Notes as dispositions of such Existing Notes for U.S. federal income tax purposes resulting from a “significant modification” of the Existing Notes (which dispositions are taxable unless treated as Recapitalizations as defined below).

Accordingly, a holder generally will recognize gain or loss upon the exchange of Existing Notes (other than Company Existing Notes, as defined below) 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.

**Broadcom Inc.**  
**EIN 35-2617337**  
**Attachment to Form 8937**  
**Report of Organizational Actions Affecting Basis of Securities**  
**Exchanges of Existing Notes for New Notes**  
**Occurring on September 30, 2021**

*Tax-Free Recapitalization Treatment of the Company's 3.125% Senior Notes, due 1/15/2025; the Company's 3.150% 4.700% Senior Notes, due 4/15/2025; the Company's 3.150% Senior Notes, due 11/15/202; the Company's 4.250% Senior Notes, due 4/15/2026; the Company's 3.459% Senior Notes due 9/15/2026; the Company's 3.875% Senior Notes due 1/15/2027; the Company's 4.700% Senior Notes due 3/15/2027; the Company's 4.110% Senior Notes due 9/15/2028; the Company's 4.110% Senior Notes due 9/15/2028; the Company's 3.500% Senior Notes due 1/15/2028; the Company's 5.000% Senior Notes due 4/15/2030; the Company's 4.750% Senior Notes due 4/15/2029; and the Company's 4.150% Senior Notes due 11/15/2030 (such Existing Notes, the "Company Existing Notes").*

The Exchanges 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 Notes are securities for U.S. federal income tax purposes. Thus, the Exchanges of Company Existing Notes for New Notes are intended to qualify as recapitalizations within the meaning of Section 368(a)(1)(E) of the Code (each, a "Recapitalization").

The Exchanges of Existing Notes other than Company Existing 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 Exchanges of Company Existing Notes for New Notes as a recapitalization.*

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

- the excess, if any, of (i) the sum of (A) any cash payment received (except to the extent attributable to accrued but unpaid interest or fractional New Notes which are deemed redeemed for cash, as described below) with respect to such exchanged Company Existing Notes and (B) the issue price of the New Notes (including any fractional New Notes which are deemed redeemed for cash, as described below) received by such Holder, over (ii) such holder's adjusted tax basis in such Company Existing Notes.; or
- the sum of (i) any cash payment received (except to the extent attributable to accrued but unpaid interest or fractional New Notes which are deemed redeemed for cash, as described below) with respect to such exchanged Company Existing Notes and (ii) the fair market value of the excess, if any, of (A) the aggregate principal amount of the New

**Broadcom Inc.**  
**EIN 35-2617337**  
**Attachment to Form 8937**  
**Report of Organizational Actions Affecting Basis of Securities**  
**Exchanges of Existing Notes for New Notes**  
**Occurring on September 30, 2021**

Notes (including any fractional New Notes which are deemed redeemed for cash, as described below) received by such holder over (B) the aggregate principal amount of the Company Existing 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 Participation Payment*

The U.S. federal income tax treatment of the receipt of the Early Participation Payment is unclear. The Company intends to take the position that the Early Participation 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 Participation 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 issue price of the New 2035 Notes to be 99.25% of face and the issue price of the New 2036 Notes to be 99% of face, which is the approximate average of trades reported on FINRA’s Trade Reporting and Compliance Engine on the first available trade dates for each respective instrument.

*Basis of New Notes Received in the Recapitalization of Company Existing Notes*

A holder’s initial tax basis in the portion of the New 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 Notes exchanged by such

**Broadcom Inc.**  
**EIN 35-2617337**  
**Attachment to Form 8937**  
**Report of Organizational Actions Affecting Basis of Securities**  
**Exchanges of Existing Notes for New Notes**  
**Occurring on September 30, 2021**

holder generally will be equal to such holder's adjusted tax basis in the Company Existing 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 Notes and (ii) increased by the amount of any gain recognized by such holder in the exchange of such Company Existing 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 Notes for New Notes may have a split basis and holding period in its New 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 Notes)

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

No loss may be recognized by a holder on the Recapitalization of Company Existing 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., 2021 for a calendar year taxpayer).