Form **8937**(December 2017) Department of the Treasury Internal Revenue Service

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

OMB No. 1545-0123

Part I Reporting Issuer		MOCHINE IN A THEOLOGY OF THE PROPERTY OF THE P				
1 Issuer's name	2 Issuer's employer identification number (EIN)					
	(200,					
Penguin Solutions, Inc. (F/K/A SMART Glo	98-1013909					
3 Name of contact for additional information	n 4 Telephoi	ne No. of contact	5 Email address of contact			
Investor Relations		1-415-954-2800	ir@penguinsolutions.com			
6 Number and street (or P.O. box if mail is	7 City, town, or post office, state, and ZIP code of contact					
C/O Investor Relations 1390 McCarthy Blv	d					
(-	Milpitas, CA 95035					
8 Date of action 9 Classification and description						
0.1.						
October 15, 2024 10 CUSIP number	Name C	12 Ticker symbol	13 Account number(s)			
11 Genamum	Jer (3)	12 Hicker Symbol	Account number(s)			
G823Y101		See Attachment				
	tach additiona		See back of form for additional questions.			
			ate against which shareholders' ownership is measured for			
the action ▶ See attachment.						

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.						
Describe the calculation of the change valuation dates ► See attachment.	n basis and the	data that supports the calcu	ulation, such as the market values of securities and the			
		WINDOWS CONTROL OF THE CONTROL OF TH				

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		The state of the s				

Liel	UII	Organizational Action (cont	inuea)		
17	List the	e applicable Internal Revenue Code	section(s) and subsection(s) upon	which the tax treatment is based ▶	See attachment.
		99990998 (10 to 14 to			
-					
18	Can an	y resulting loss be recognized? ▶	See attachment.		
-					
10	Drovida	any other information passages, to	implement the adjustment such	as the reportable tax year ▶ See at	
19	riovide	e any other information necessary to	implement the adjustment, such	as the reportable tax year > See at	acnment.
9					
	(animalian animalian ani				
-					
	Unde	er penalties of perjury, I declare that I ha f, it is true, correct, and complete. Declar	we examined this return, including accoration of preparer (other than officer) is	companying schedules and statements, based on all information of which prepar	and to the best of my knowledge and er has any knowledge.
Sign Here		ature ▶		Date ► Oct 1	5, 2024
	Print	your name Nate 01	instead	Title > GVF	*+CFO
Paid	1	Print/Type preparer's name	Preparer's signature	Date	Check if PTIN self-employed
	oarer Only	Firm's name ▶			Firm's EIN ▶
	Office	Firm's address ▶			Phone no.
Send	Form 89	937 (including accompanying staten	nents) to: Department of the Treas	sury, Internal Revenue Service, Ogde	THE CONTRACTOR ASSESSMENT OF THE PROPERTY OF THE PARTY OF

Penguin Solutions, Inc. (F/K/A SMART Global Holdings, Inc.) EIN: 98-1013909 Attachment to Form 8937

Form 8937, Part I, Box 12:

Prior to the Name Change (described in Part II, Line 14 below), shares of SMART Global Holdings, Inc. ("SGH") common stock traded under the ticker symbol "SGH." Following the Name Change, such securities began to trade under the ticker symbol "PENG."

Form 8937, Part II, Box 14:

On October 15, 2024, SGH changed its name to Penguin Solutions, Inc. (the "Name Change").

Form 8937, Part II, Boxes 15 and 16:

The Name Change is intended to be treated as a reorganization within the meaning of Section 368(a)(1)(F) of the Internal Revenue Code of 1986, as amended. A shareholder's basis in their shares of Penguin stock is expected to be the same as their basis in their shares of SGH stock prior to the Name Chage.

Form 8937, Part II, Box 17:

Sections 354, 358, and 368(a).

Form 8937, Part II, Box 18:

No.

Form 8937, Part II, Box 19:

The Name Change occurred during the tax year ending August 29, 2025.