

Global Medical Response, Inc.

FEIN: 20-1305023

**Treasury Regulation Section 1.1273-2(f)(9) Disclosure**

**Issuer's Determination and Communication of "Traded on an Established Market" Status and Issue Price of Newly Issued Debt**

Global Medical Response, Inc. (the "**Company**") is providing this disclosure pursuant to the requirements of Treasury Regulation section 1.1273-2(f)(9) (the "**Issue Price Disclosure Regulation**"). The Issue Price Disclosure Regulation, issued by the Department of the Treasury on September 12, 2012, and effective for transactions occurring on or after November 13, 2012, requires the issuer of a debt instrument to disclose its issue price within 90 days of the issue date if the issuer determines that either the debt instrument itself, or the property for which the debt instrument is issued (including another debt instrument), is "**traded on an established market**" as defined in Treasury Regulation section 1.1273-2(f)(1).

This disclosure is intended to fulfill the Company's notification obligation under the Issue Price Disclosure Regulation and does not constitute tax advice and does not purport to take into account any debt holder's specific circumstances. Holders of the debt instruments described herein are urged to consult their own tax advisors regarding the U.S. tax consequences of the transaction described herein.

All references herein to "**section**" are to the Internal Revenue Code of 1986, as amended, and all references to "**Treas. Reg. section**" are to the regulations issued thereunder.

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On or about May 20, 2024 (the "**Exchange Date**"), the Company consummated the following transactions with holders of certain of its debt.

- Holders of approximately \$3,661,827,386 aggregate principal amount of the Company's "**Existing First Lien Term Loans**" consisting of approximately (1) \$1,792,003,020 in aggregate principal amount of first lien term loans due March 14, 2025, and (2) \$1,869,824,366 in aggregate principal amount of first lien term loans due October 2, 2025, exchanged the Existing First Lien Term Loans for an aggregate principal amount of approximately \$3,698,815,541 of "**New First Lien Term Loans**" due October 31, 2028.
- Holders of approximately \$573,911,000 aggregate principal amount of the Company's "**Existing Senior Secured Notes**" due October 1, 2025, exchanged the Existing Senior Secured Notes for an aggregate principal amount of approximately \$579,707,969 of "**New Senior Secured Notes**" due October 31, 2028.

The Company determined, and the rest of this discussion assumes, that the exchange of the (1) Existing First Lien Term Loans for New First Lien Term Loans and (2) Existing Senior Secured Notes for New Senior

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Secured Notes resulted in a significant modification of the Existing First Lien Term Loans and Existing Senior Secured Notes under Treas. Reg. section 1.1001-3, resulting in the New First Lien Term Loans and New Senior Secured Notes being treated as newly issued debt on the Exchange Date. Because the New First Lien Term Loans and New Senior Secured Notes were issued for property (i.e., the Existing First Lien Term Loans and Existing Senior Secured Notes, as applicable), the Issue Price Disclosure Regulation applies if the issue price of the New First Lien Term Loans and New Senior Secured Notes is determined under Treas. Reg. section 1.1273-2(b) or Treas. Reg. section 1.1273-2(c).

The Company determined that the New First Lien Term Loans and New Senior Secured Notes were traded on an established market within the meaning of Treas. Reg. section 1.1273-2(f)(1) during the 31-day period ending 15 days after the Exchange Date. Accordingly, in accordance with Treas. Reg. section 1.1273-2(b), the issue price of the New First Lien Term Loans and New Senior Secured Notes is equal to their fair market value as of the Exchange Date.

The Company determined that the fair market value as of the Exchange Date of the (1) New First Lien Term Loans, and thus the issue price of the New First Lien Term Loans, was 99.129% expressed as a percentage of principal (i.e., \$991.29 per \$1,000 principal of New First Lien Term Loans) and (2) New Senior Secured Notes, and thus the issue price of the New Senior Secured Notes, was 98.125% expressed as a percentage of principal (i.e., \$981.25 per \$1,000 principal of New Senior Secured Notes).

This issue price determination is binding on all holders of the New First Lien Term Loans and New Senior Secured Notes unless a holder explicitly discloses on the holder's timely filed U.S. federal income tax return for the taxable year that includes its acquisition date of the New First Lien Term Loans and New Senior Secured Notes, as applicable, in accordance with the requirements of the Issue Price Disclosure Regulation, that its determination regarding issue price is different from the Company's determination.