

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.

Sign Here

Signature ▶ Avery Johnson Date ▶ Sept. 29, 2023
Print your name ▶ Avery Johnson Title ▶ Vice President, Tax

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶			Firm's EIN ▶	
	Firm's address ▶			Phone no.	

Avient Corporation
33587 Walker Road, Avon Lake, OH 44012
EIN: 34-1730488

Attachment to Form 8937

Report of Organizational Actions Affecting Basis of Securities
Debt Exchange – Deemed Exchange of Term B-5 Loans and Term B-6 Loans for Term B-7 Loans

The information contained in Form 8937 and this attachment does not constitute tax advice and is not intended to be a complete analysis or description of all potential U.S. federal income tax consequences of the Debt Exchange Transaction described herein. In addition, this information does not address tax consequences applicable based on the individual circumstances of lenders of any of the loans described below that participated in the Debt Exchange Transaction, or any non-income, foreign, state, or local tax consequences of the Debt Exchange Transaction.

Accordingly, lenders of any of the loans described below that participated in the Debt Exchange Transaction are strongly urged to consult with their own tax advisors to determine the particular U.S. federal, state, local, foreign or other tax consequences of the Debt Exchange Transaction to them, including the impact on tax basis resulting therefrom.

Part I

Line 9. For each security involved in the organizational action, the requested information (classification and description) is as follows:

Those Term B-5 Loans ("Term B-5 Loans"), Term B-6 Loans ("Term B-6 Loans") and Term B-7 Loans ("Term B-7 Loans") made pursuant to the Credit Agreement dated of November 12, 2015, as amended and restated (the "Credit Agreement"), among Avient Corporation (formerly known as Polyone Corporation), an Ohio corporation (the "Borrower"), each subsidiary of the Borrower from time to time party thereto, the lenders party thereto and Citibank, N.A., as administrative agent for the lenders (the "Administrative Agent").

Line 10. For each security involved in the organizational action, the requested information (CUSIP number) is as follows:

Term B-5 Loans	73179YAK3
Term B-6 Loans	73173YAL1
Term B-7 Loans	73179YAM9

Part II

Line 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:

Pursuant to the 8th amendment to the Credit Agreement, effective as of August 16, 2023, (i) certain lenders of Term B-5 Loans agreed to convert Term B-5 Loans in an aggregate principal amount of \$306,434,610.63 (the "Converted Term B-5 Loans") into the same principal amount

of new Term B-7 Loans, (ii) certain lenders of Term B-6 Loans agreed to convert Term B-6 Loans in an aggregate principal amount of \$356,444,289.28 (the “Converted Term B-6 Loans”) into the same principal amount of new Term B-7 Loans and (iii) certain lenders were issued \$68,718,137.07 in an aggregate principal amount of new Term B-7 Loans for cash of equal amount (the “Refinancing Term B-7 Loans”). In addition, cash was used to pay down \$100,000,000.00 in aggregate principal amount of Term B-5 Loans and Term B-6 Loans at par.

The deemed exchange of Term B-5 Loans and Term B-6 Loans each for the same principal amount of new Term B-7 Loans resulting from the transactions described above is referred to herein as the “Debt Exchange Transaction”.

Line 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:

As described above in Line 14, each lender of Converted Term B-5 Loans and each lender of Converted Term B-6 Loans received a specified principal amount of new Term B-7 Loans equal to the amount of such Converted Term B-5 Loans or Converted Term B-6 Loans exchanged for such new Term B-7 Loans. The terms of the new Term B-7 Loans vary in several respects from the terms of each of the Converted Term B-5 Loans and the Converted Term B-6 Loans by, among other things, providing for a different rate of interest. The Borrower believes that the exchanged Converted Term B-5 Loans and Converted Term B-6 Loans will each be treated as having undergone a “significant modification” under the applicable Treasury Regulations. Accordingly, each converting lender generally will be treated as having exchanged its Converted Term B-5 Loans or Converted Term B-6 Loans for the corresponding amount of the new Term B-7 Loans in an exchange for U.S. federal income tax purposes.

If the Converted Term B-5 Loans, the Converted Term B-6 Loans and the new Term B-7 Loans are treated as “securities” for purposes of Section 368(a)(1)(E), the Debt Exchange Transaction would be treated as a recapitalization under Section 368(a)(1)(E) of the Internal Revenue Code of 1986, as amended (the “Code”). Neither the Code nor the Treasury Regulations define the term “security” for this purpose and because of limited guidance in this area, it is unclear whether any of the Converted Term B-5 Loans, the Converted Term B-6 Loans and the new Term B-7 Loans should be treated as “securities” for this purpose.

If the exchange of Converted Term B-5 Loans or Converted Term B-6 Loans for new Term B-7 Loans are treated as recapitalizations, a lender of Converted Term B-5 Loans or Converted Term B-6 Loans that participated in the Debt Exchange Transaction should not recognize gain or loss pursuant to the Debt Exchange Transaction. Further, such lender’s initial basis in the new Term B-7 Loans received in the Debt Exchange Transaction should be equal to such lender’s adjusted basis in the allocable portion of the Converted Term B-5 Loans or Converted Term B-6 Loans exchanged for such new Term B-7 Loans immediately prior to the Debt Exchange Transaction (excluding any amounts attributable to accrued interest).

If the exchange of Converted Term B-5 Loans or Converted Term B-6 Loans for new Term B-7 Loans are not treated as recapitalizations, such exchanges should be treated as fully taxable under section 1001 of the Code. A lender’s tax basis in its new Term B-7 Loans received in the

Debt Exchange Transaction should equal the fair market value of the new Term B-7 Loans on the issue date of the Term B-7 Loans.

If a lender of Term B-5 Loans or Term B-6 Loans acquired Refinancing Term B-7 Loans for cash (which such Term B-5 Loans or Term B-6 Loans were thereupon repaid in cash by the Borrower), such lender may be treated as having undergone a “significant modification” generally with the same tax consequences as described above. Any such lender should consult their own tax advisors regarding the tax consequences of such transaction.

Lenders should consult their own tax advisors regarding the particular tax consequences of the Debt Exchange Transaction to them.

Line 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:

The basis of a lender in its new Term B-7 Loans received in the Debt Exchange Transactions are calculated in the matter described above in Line 15.

Lenders should consult their own tax advisors regarding the particular tax consequences of the Debt Exchange Transaction to them.

Line 17. List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based:

354, 358, 368(a)(1)(E), 1001, 1012

Line 18. Can any resulting loss be recognized?

In the case that the Debt Exchange Transaction constitutes a recapitalization under Section 368(a)(1)(E) of the Code, lenders of Converted Term B-5 Loans or Converted Term B-6 Loans that participated in the Debt Exchange Transaction cannot recognize loss realized in the exchange.

In the case that any Debt Exchange Transaction is not treated as a recapitalization, loss may be recognized for U.S. federal income tax purposes to the extent that a lender’s aggregate tax basis exceeds the fair market value of the new Term B-7 Loans received by such Lender.

Lenders should consult their own tax advisors regarding the particular tax consequences of the Debt Exchange Transaction to them. In addition, lenders of Term B-5 Loans and Term B-6 Loans that acquired Refinancing Term B-7 Loans for cash should consult their own tax advisors regarding the tax consequences of the repayment of the Term B-5 Loans or Term B-6 Loans.

Line 19. Provide any other information necessary to implement the adjustment, such as the reportable tax year:

The tax consequences of the Debt Exchange Transaction should be reported by a lender in its tax year that includes the date of August 16, 2023.

The new Term B-7 Loans exchanged for the Converted Term B-5 Loans and Converted Term B-6 Loans will be treated as part of the same issue for U.S. federal income tax purposes as the Refinancing Term B-7 Loans which were newly issued for cash. Pursuant to Treasury Regulations Section 1.1273-2(f)(9), the Borrower has determined that (i) the Term B-7 Loans and the Refinancing Term B-7 Loans are traded on an established market and (ii) the issue price for U.S. federal income tax purposes of the Term B-7 Loans (including the Term B-7 Loans exchanged for both the Converted Term B-5 Loans and Converted Term B-6 Loans and the Refinancing Term B-7 Loans) was 100.00% (stated as a percentage of par). The issue date of the Term B-7 Loans was August 16, 2023.

Lenders should consult their own tax advisors to determine the tax consequences to them of the exchange of Converted Term B-5 Loans and Converted Term B-6 Loans for new Term B-7 Loans pursuant to the Debt Exchange Transaction. In addition, lenders of Term B-5 Loans and Term B-6 Loans that acquired Refinancing Term B-7 Loans for cash should consult their own tax advisors regarding the tax consequences to them of the repayment of the Term B-5 Loans or Term B-6 Loans and the receipt of the Refinancing Term B-7 Loans.