

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 attached.

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

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

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 ▶ _____

Print your name ▶ Josh Riley Title ▶ Vice President, Finance & 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.			

Nine Energy Service, Inc.
EIN: 80-0759121
Date of Action: March 5, 2026
Attachment to Internal Revenue Service Form 8937
Report of Organization Actions Affecting Basis of Securities

The information contained herein is being provided pursuant to the requirements of Section 6045B of the Internal Revenue Code of 1986, as amended.

The information contained herein does not constitute tax advice and does not purport to be complete or to describe the tax consequences that may apply to particular categories of creditors or shareholders. Each creditor and shareholder should consult its own tax advisor regarding the particular tax consequences of the transaction to them, including the applicability and effect of all U.S. federal, state, and local and foreign tax law.

Unless otherwise specified herein, “Section” references are to the Code or Treasury regulations promulgated thereunder.

Part II: Organizational Action

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.

On February 1, 2026 (the “Petition Date”), Nine Energy Service, Inc. (“Nine”) and its subsidiaries (collectively, the “Nine Subsidiaries”) filed voluntary petitions under Chapter 11 of the United States Bankruptcy Code to pursue the Joint Prepackaged Chapter 11 Plan of Reorganization of Nine and its Affiliated Debtors, dated February 1, 2026 (the “POR”). Nine and the Nine subsidiaries filed the Disclosure Statement for Joint Prepackaged Chapter 11 Plan of Reorganization of Nine and its Affiliated Debtors, dated February 1, 2026 (the “Disclosure Statement”) in connection with the solicitation of votes on the POR.

As of the Petition Date, Nine had outstanding liabilities subject to compromise totaling approximately \$319.5 million (inclusive of accrued interest), consisting of its outstanding Senior Secured Notes due 2028, in the original aggregate principal amount of \$300,000,000 (the “Existing Notes”).

On March 4, 2026, the Bankruptcy Court entered an order confirming the POR. Pursuant to the POR, on March 5, 2026 (the “Effective Date”), the following occurred:

Except to the extent that a holder of the Existing Notes agrees to less favorable treatment, each of the holders of the Existing Notes (the “Creditors”) received, in full satisfaction, settlement, release, and discharge of each of its claims arising under or relating to the Existing Notes, its pro rata share of 100% of the newly issued common stock of reorganized

Nine (“New Common Stock”) (the “Exchange”). As a result of the Exchange, the Creditors received 100% of the New Common Stock of Nine in the same proportion in which they held their Existing Notes immediately prior to the Effective Date.

All of the existing equity interests in Nine outstanding immediately prior to the Effective Date were cancelled and discharged, and the holders of such equity interests did not receive or retain any distribution or property on account of such interests.

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.

Although the matter is not free from doubt, Nine is expected to treat the Exchange as discussed below.

The Exchange is expected to be treated as a recapitalization pursuant to Section 368(a)(1)(E) if the Existing Notes are treated as a “security” and the New Common Stock is treated as “stock” within the meaning of Section 354. Since Nine did not issue any additional consideration other than the New Common Stock in the Exchange, the Creditor’s basis in the New Term Loans is expected to be equal to its adjusted basis in the portion of the Existing Notes exchanged for New Common Stock, subject to the rules regarding accrued but untaxed interest, assuming the Exchange is treated as a recapitalization.

Alternatively, if the Existing Notes are not treated as a “security” and New Common Stock is treated as “stock” within the meaning of Section 354, the Exchange is expected to be treated as a taxable exchange pursuant to Section 1001. Under this assumption, gain or loss is expected to be realized by the Creditors on the Exchange. As such, the Creditor’s basis in the New Common Stock is expected to be equal to the fair market value of the New Common Stock.

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.

As discussed in Line 15 above, to the extent the Exchange qualifies as a recapitalization pursuant to Section 368(a)(1)(E), the Creditor’s aggregate initial tax basis in the New Common Stock is expected to equal its aggregate adjusted tax basis in the Existing Notes exchanged for the New Common Stock.

To the extent the Exchange does not qualify as a recapitalization, it is expected to be treated as a taxable exchange pursuant to Section 1001. As such, the Creditor’s aggregate initial tax basis in the New Common Stock is expected to be equal to its fair market value.

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

Section 354, Section 368, Section 1001, Section 1012.

Line 18: Can any resulting loss be recognized?

If the Exchange qualifies as a recapitalization pursuant to Section 368(a)(1)(E), it is expected that the Exchange would not result in a loss being recognized by the Creditors.

However, if the Exchange does not qualify as a tax-free reorganization, the Exchange may result in a Creditor recognizing a loss if the Creditor's tax basis in the Existing Notes exchanged exceeds the aggregate fair market value of the New Common Stock received. Note, this is subject to further analysis by the Creditor's advisors to determine whether any loss limitation rules apply to the Exchange.

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

The Exchange was executed on March 5, 2026. For a Creditor whose taxable year is the calendar year, the reportable tax year is 2026.