

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.](#)

Blank lines for providing Internal Revenue Code section(s) and subsection(s).

18 Can any resulting loss be recognized? ▶ [See attached.](#)

Blank lines for providing information regarding resulting loss recognition.

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

Blank lines for providing other information necessary to implement the adjustment.

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
Signed by: Rachel Silverstein
Signature ▶ 76DECF76B2A441... Date ▶ 5/4/2026
Print your name ▶ Rachel Silverstein Title ▶ EVP, General Counsel

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.

PRIVILEGED & CONFIDENTIAL

May 1, 2026

**Keel Infrastructure Corp.
EIN: 41-4266374**

Attachment to Form 8937 – Report of Organizational Actions Affecting Basis of Securities

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.

On April 1, 2026, pursuant to the Arrangement Agreement, dated February 6, 2026, by and among Bitfarms Ltd., a corporation existing under the laws of Ontario (the "Corporation"), Keel Infrastructure Corp., a Delaware corporation ("Keel"), and 1576430 B.C. Unlimited Liability Company, an unlimited liability company existing under the laws of the Province of British Columbia and a direct wholly-owned subsidiary of Keel ("AcquisitionCo"), Keel indirectly acquired all the outstanding stock of the Corporation with the Corporation surviving as a wholly-owned subsidiary of Keel (the "Arrangement").

Part II, 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.

Assuming the Arrangement qualifies as a reorganization within the meaning of Section 368(a) of the Internal Revenue Code of 1986, as amended (the "Code"), or as an exchange of property for stock under Section 351 of the Code, the basis of the Keel common stock received by a former Corporation shareholder in the Arrangement will be equal to the shareholder's basis in the Corporation common stock surrendered in exchange for such Keel common stock.

Part II, 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.

See above for description of the change in basis. Shareholders should consult their tax advisors for more information.

Part II, Line 17

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

This treatment is based on Sections 351(a), 354(a), 358(a), and 368(a)(1)(B) of the Code.

Part II, Line 18

Can any resulting loss be recognized?

Assuming that the Arrangement qualifies as a reorganization within the meaning of Section 368(a)(1)(B) of the Code, or as an exchange of property for stock under Section 351 of the Code, former Corporation shareholders will not recognize any loss for U.S. federal income tax purposes as a result of their receipt of Keel common stock in the Arrangement.

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Part II, Line 19

Provide any other information necessary to implement the adjustment, such as the reportable tax year

The reportable event occurred on April 1, 2026, and is reportable in the shareholder's tax year that includes that date. Shareholders should consult with a qualified tax advisor for questions regarding their specific tax treatment.