



**Part II** Organizational Action *(continued)*

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ [PLEASE SEE ATTACHMENT](#)

Horizontal lines for providing the applicable Internal Revenue Code section(s) and subsection(s).

18 Can any resulting loss be recognized? ▶ [PLEASE SEE ATTACHMENT](#)

Horizontal lines for providing information regarding the recognition of a resulting loss.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ [PLEASE SEE ATTACHMENT](#)

Horizontal lines for providing any 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**  
Signature ▶ *K. Folkard* Date ▶ 13 January 2025

<b>Paid Preparer Use Only</b>	Print your name ▶ <b>KIMBERLY FOLKARD</b>	Preparer's signature	Title ▶ <b>MANAGING DIRECTOR</b>	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶				Firm's EIN ▶	
	Firm's address ▶				Phone no.	

## Brookfield Renewable Corporation

### Arrangement

#### Attachment to Form 8937 – Part II

***IRS Form 8937 (Report of Organizational Actions Affecting Basis of Securities) is being made available by Brookfield Renewable Corporation (“BEPC”) pursuant to Section 6045B of the Internal Revenue Code of 1986, as amended, which requires issuers of certain securities to report organizational actions that affect the U.S. federal income tax basis of holders of the securities.***

***The information contained herein does not constitute tax advice and does not purport to be complete or to describe the consequences that may apply to particular categories of shareholders. BEPC does not provide tax advice to its shareholders. Any examples herein are illustrative and are furnished pursuant to Section 6045B of the Internal Revenue Code solely as a convenience to shareholders and their tax advisers in establishing their specific tax positions. Shareholders are urged to consult their own tax advisers regarding the tax consequences of the matters addressed herein in light of their particular circumstances.***

#### **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.

In response to proposed amendments relating to mutual fund corporations in the recent Canadian federal budget, BEPC undertook a reorganization implemented by way of a plan of arrangement (the “Arrangement”). Pursuant to the Arrangement, holders of class A exchangeable subordinate voting shares (“Exchangeable Shares”) of BEPC (which was renamed “Brookfield Renewable Holdings Corporation” pursuant to the Arrangement) received on a one-for-one basis, in exchange for such Exchangeable Shares, new class A exchangeable shares (“New Exchangeable Shares”) of 1505127 B.C. Ltd. (which was renamed “Brookfield Renewable Corporation” pursuant to the Arrangement). The Arrangement is described in the Notice of Special Meeting of Shareholders and Management Information Circular, dated October 23, 2024 (the “Circular”), available at <https://www.sedarplus.ca>. The Arrangement became effective prior to the market opening on December 24, 2024.

**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.

The exchange of Exchangeable Shares for New Exchangeable Shares on a one-for-one basis pursuant to the Arrangement, taken together with certain related transfers pursuant to the Arrangement, should qualify as a transfer described in Section 351. Accordingly, a U.S. holder who received New Exchangeable Shares pursuant to the Arrangement should not recognize gain or loss and should have an aggregate tax basis in the New Exchangeable Shares received in the Arrangement equal to the holder's aggregate tax basis in the Exchangeable Shares surrendered in exchange therefor. The U.S. holder's holding period for the New Exchangeable Shares received in the Arrangement should include the holder's holding period for its Exchangeable Shares surrendered in exchange therefor.

U.S. holders are urged to review the detailed discussion of the U.S. federal income tax consequences relating to the Arrangement set forth in the Circular under the heading "Certain United States Federal Income Tax Considerations," including important assumptions as to the U.S. federal income tax treatment of the New Exchangeable Shares and Exchangeable Shares.

**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 described in the response to Line 15 above, a U.S. holder should have an aggregate tax basis in the New Exchangeable Shares received pursuant to the Arrangement equal to the holder's aggregate tax basis in the Exchangeable Shares surrendered in exchange therefor.

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

Sections 351 and 358.

**Line 18**      **Can any resulting loss be recognized?**

No loss should be recognized by a U.S. holder upon the exchange of Exchangeable Shares for New Exchangeable Shares pursuant to the Arrangement.

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

The Arrangement became effective prior to the market opening on December 24, 2024. The determination of tax basis described above is taken into account in the taxable year of the shareholder during which the Arrangement became effective. For calendar year taxpayers, the applicable tax year is therefore 2024.