

Form **8937**
(December 2017)
Department of the Treasury
Internal Revenue Service

Report of Organizational Actions Affecting Basis of Securities

OMB No. 1545-0123

▶ See separate instructions.

Part I Reporting Issuer

| | | | |
|--|---|---|-----------------------------|
| 1 Issuer's name T Stamp Inc. | | 2 Issuer's employer identification number (EIN) 81-3777260 | |
| 3 Name of contact for additional information David Waldman | 4 Telephone No. of contact (212) 671-1021 | 5 Email address of contact idai@crescendo-ir.com | |
| 6 Number and street (or P.O. box if mail is not delivered to street address) of contact Crescendo Communications, LLC 405 Lexington Ave, 9th Floor, Suite 9034 | | 7 City, town, or post office, state, and ZIP code of contact New York, NY 10174 | |
| 8 Date of action 3/23/2023 | | 9 Classification and description Common Stock | |
| 10 CUSIP number See attached | 11 Serial number(s) | 12 Ticker symbol IDAI | 13 Account number(s) |

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

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 ▶ [See attached.](#)

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 ▶ [See attached.](#)

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 attached.](#)

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.

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
DocuSigned by:
Signature ▶ Andrew Gowasack Date ▶ 5/3/2023
Print your name ▶ Andrew Gowasack Title ▶ President

| | | | | | |
|-------------------------------|---|--|------------------|---|-------------------|
| Paid Preparer Use Only | Print/Type preparer's name Jason J. Hakerem | Preparer's signature  | Date 5/3/2023 | Check <input type="checkbox"/> if self-employed | PTIN P00542071 |
| | Firm's name ▶ DELOITTE TAX LLP | Firm's EIN ▶ 86-1065772 | | Phone no. ▶ 404-220-1500 | |
| | Firm's address ▶ 191 PEACHTREE STREET SUITE 2000 ATLANTA, GA 30303 | | | | |

T Stamp Inc.
FEIN: 81-3777260
Attachment to Form 8937
Report of Organizational Actions Affecting Basis of Securities

Form 8937, Part I, Line 10

Pre-reverse Split Shares CUSIP: 873048300
Post-reverse Split Shares CUSIP: 873048409

Form 8937, Part II, Line 14

On March 23, 2023, effective at 12:01am Eastern Standard Time, T Stamp Inc. (the “Company”) executed a 1-for-5 share reverse stock split of all Company common stock outstanding. No fractional shares were issued. Shareholders who would otherwise have been entitled to a fractional share of common stock received one (1) whole share in lieu of such fractional share (i.e., the “rounded-up share”). No cash was paid in lieu of fractional shares.

Form 8937, Part II, Line 15

The Reverse Stock Split is intended to qualify as a reorganization under Section 368(a)(1)(E). Accordingly, the aggregate tax basis of the post-Reverse Stock Split shares received by a shareholder will be equal to the aggregate tax basis of its pre-Reverse Stock Split. The holding period of the post-Reverse Stock Split shares received by a shareholder will include the holding period of the pre-Reverse Stock Split shares exchanged by such shareholder.

The federal income tax consequences of the rounded-up share are unclear. A holder of the pre-Reverse Stock Split shares may recognize income or gain to the extent of the value of the rounded-up share exceeds the tax basis of the post-Reverse Stock Split fractional share so “rounded-up.” Each shareholder should consult with their tax advisor with respect to the computation of gain or loss and adjusted tax basis in the shares issued in the transaction (including the rounded-up shares) based on their specific facts.

Since each shareholder of shares received fewer shares of that class of shares than were surrendered, the basis in the surrendered shares must be allocated in a manner that reflects, to the greatest extent possible, that a share of stock received is received in respect of shares of stock that were acquired on the same date and at the same price. To the extent that it is not possible to allocate in this manner, the basis of the shares surrendered must be allocated to the shares of stock received in a manner that minimizes the disparity in the holding periods of the surrendered shares whose basis is allocated to any particular share received. This could result in a particular share having a split basis and a split holding period. Each shareholder should consult with their tax advisor with respect to the computation of basis in this transaction based on their specific facts.

Form 8937, Part II, Line 16

Upon the effective date of the reverse stock split, every five (5) shares of common stock of the

Company automatically converted into one (1) share of common stock. As a result, shareholders must allocate the aggregate tax basis in their shares held immediately prior to the reverse stock split among the shares held immediately after the reverse stock split. Shareholders that have acquired different blocks of common stock at different times or at different prices are urged to consult their own tax advisors regarding the allocation of their aggregated adjusted basis among, and the holding period of, that common stock.

Form 8937, Part II, Line 17

Sections 354(a), 358, and 368(a)(1)(E).

Section 1001 (potentially with respect to rounded-up shares)

Form 8937, Part II, Line 18

Shareholders may not recognize loss as a result of the reverse stock split (except potentially with respect to the rounded-up share). The federal income tax consequences of the rounded-up shares are unclear. Each shareholder should consult with their tax advisor with respect to the computation of gain or loss and basis in transaction based on their specific facts.

Form 8937, Part II, Line 19

The reportable tax year is 2023 for shareholders reporting taxable income on a calendar year basis. For shareholders reporting taxable income on a basis other than calendar year, the reportable year is the shareholder's tax year that includes March 23, 2023.