

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
Signature ▶  Date ▶ 11/24/2025

Print your name ▶ Lubi Kutua Title ▶ CFO

Paid Preparer Use Only	Print/Type preparer's name Scott Ferguson	Preparer's signature 	Date 11/24/2025	Check <input type="checkbox"/> if self-employed	PTIN P00653591
	Firm's name ▶ Deloitte Tax LLP			Firm's EIN ▶ 86-1065772	
	Firm's address ▶ 555 West 5th Street, Suite 2700, Los Angeles, CA 90013			Phone no. 213-688-0800	

Beyond Meat, Inc.

EIN: 26-4087597

Attachment to Form 8937

Report of Organizational Actions Affecting Basis of Securities

Disclaimer: The information contained herein is being provided pursuant to the requirements of section 6045B of the Internal Revenue Code of 1986, as amended (the “Code”), and includes a general summary regarding the application of certain United States (“U.S.”) federal income tax laws and regulations related to the effects of the organizational action as described in Part II, Line 14 on securities. The information contained in Form 8937 and this attachment does not constitute tax advice and does not purport to take into account any lender’s specific circumstances. Lenders are urged to consult their own tax advisors regarding U.S. tax consequences of the transactions described herein and the impact to tax basis resulting from the amendments.¹

¹ Unless otherwise provided, all “section” references herein are to the Code, and all “Treas. Reg. §” references are to the U.S. Department of the Treasury (“**Treasury**”) regulations promulgated thereunder, as effective through the date of this filing.

Form 8937, Part II, Line 14

On September 29, 2025, Beyond Meat, Inc., a Delaware corporation (the “**Company**”), made an exchange offer to all holders of the \$1.15 billion in aggregate principal amount of the Company’s 0% Convertible Senior Notes due 2027 (the “**Existing Convertible Notes**”) issued pursuant to the indenture dated March 5, 2021.

The Company offered to exchange (the “**Exchange Offer**”), upon the terms and subject to the conditions set forth in the exchange offer memorandum and consent solicitation statement (“**Offering Memorandum**”), any and all Existing Convertible Notes for a pro rata portion of:

- (i) up to \$202.5 million in aggregate principal amount of 7.00% Convertible Senior Secured Second Lien PIK Toggle Notes due 2030 (the “**New Convertible Notes**”), issued by the Company; and
- (ii) up to 326,190,370 shares of the Company’s common stock (the “**New Shares**” and, together with the New Convertible Notes, the “**Offered Securities**”) with such New Shares representing approximately 81.0% of the Company’s common stock immediately after giving effect to the Exchange Offer.

In addition, the Company agreed in the Transaction Support Agreement² to pay or cause to be paid to the Supporting Noteholders, in proportion to the principal amount of Existing Convertible Notes held by each such Supporting Noteholder, at the Initial Settlement Date, a non-refundable amount equal to \$12.5 million in aggregate principal amount of New Convertible Notes (“**SteerCo Premium**”).

Form 8937, Part II, Line 15

The exchange of Existing Convertible Notes for the Offered Securities pursuant to the Exchange Offer will constitute a disposition of such Existing Convertible Notes for U.S. federal income tax purposes (which will be taxable, unless treated as a recapitalization, as discussed below) if the exchange results in a “significant modification” of the Existing Convertible Notes within the meaning of the applicable Treasury regulations.

We believe that the differences between the terms of the Existing Convertible Notes and the Offered Securities will be considered significant within the meaning of the applicable Treasury regulations, and therefore we intend to take the position that the exchange of the Existing Convertible Notes for the Offered Securities will result in a significant modification of the exchanged Existing Convertible Notes.

Holders of the Existing Convertible Notes should consult their tax advisors regarding the U.S. federal income tax characterization of the exchange of Existing Convertible Notes for the Offered Securities pursuant to the Exchange Offer.

² Capitalized terms not defined herein have the meaning ascribed to them in the Offering Memorandum.

Tax Treatment as Recapitalization

Because holders of Existing Convertible Notes participating in the Exchange Offer would receive New Shares in the Exchange Offer (along with New Convertible Notes), an exchange of Existing Convertible Notes for Offered Securities generally would constitute a “recapitalization,” within the meaning of section 368(a)(1)(E) of the Code if the Existing Convertible Notes constitute “securities” for U.S. federal income tax purposes.

The term “security” is not defined in the Code or Treasury regulations and has not been clearly defined by judicial decisions. Whether a debt instrument is a security is based on all facts and circumstances, but most authorities have held that the term to maturity of the debt instrument is one of the most significant factors. Generally, corporate debt instruments with maturities at issuance of less than five years are not considered securities, while corporate debt instruments with maturities at issuance of ten years or more are considered securities. However, the precise limits are unclear, and an instrument with an original term of as little as five years may also qualify as a security. In addition, the convertibility of a debt instrument into stock of the issuer, or another term of a debt instrument that results in equitization into stock of the issuer (such as the mandatory equitization terms of the New Convertible Notes), may support treatment as a “security” because of the possible equity participation in the issuer. While the relevant tax treatment of the exchange is not clear, we intend to treat the Existing Convertible Notes and the New Convertible Notes as securities for U.S. federal income tax purposes, and thus the exchange of Existing Convertible Notes for the Offered Securities should qualify as a recapitalization for U.S. federal income tax purposes in which no Exchange Consideration (including the Early Exchange Premium and the SteerCo Premium) is treated as boot for relevant U.S. federal income tax purposes.

Assuming that the exchange of Existing Convertible Notes for Offered Securities pursuant to the Exchange Offer is treated as a recapitalization in which no Exchange Consideration is treated as boot, a holder of Existing Convertible Notes that exchanges Existing Convertible Notes for Offered Securities would not recognize any gain or loss realized on the exchange. In such case, a holder’s holding period for the Offered Securities will include such holder’s holding period for the Existing Convertible Notes exchanged therefor. A holder’s adjusted tax basis in its Existing Convertible Notes exchanged would carry over to the Offered Securities and be allocated pro rata between the New Convertible Notes and the New Shares received, based on their relative fair market values on the applicable Settlement Date.

A holder should consult its tax advisor regarding the proper tax treatment of the exchange of the Existing Convertible Notes for the Offered Securities (including the Early Exchange Premium and the SteerCo Premium) pursuant to the Exchange Offer.

Taxable Exchange Treatment

Subject to the discussion above regarding the intended treatment of the exchange of Existing Convertible Notes for the Offered Securities as a recapitalization, a holder subject to U.S. federal income taxation generally would recognize gain or loss upon the exchange of Existing Convertible Notes for the Offered Securities that is not treated as a recapitalization in an amount equal to the difference between (i) the sum of (A) the issue price of the New Convertible Notes

received (including the SteerCo Premium and the Early Exchange Premium) and (B) the fair market value of the New Shares received on the date of the exchange, each as determined for U.S. federal income tax purposes, and (ii) such holder's adjusted tax basis in the Existing Convertible Notes exchanged. A holder's adjusted tax basis in an Existing Convertible Note generally would equal the holder's initial cost of the Existing Convertible Note. The Offered Securities received in the exchange would have a new holding period commencing on the day after the applicable Settlement Date of the exchange, the initial tax basis of the New Convertible Notes received generally would be equal to their issue price and the initial tax basis of the New Shares received would be their fair market value on the date of the exchange.

A holder should consult its tax advisor regarding the proper tax treatment of the exchange of the Existing Convertible Notes for the Offered Securities (including the Early Exchange Premium and the SteerCo Premium) pursuant to the Exchange Offer.

Form 8937, Part II, Line 16

As discussed in Line 15 above, if the exchange is treated as a recapitalization for U.S. federal income tax purposes, a holder's adjusted tax basis in its Existing Convertible Notes exchanged would carry over to the Offered Securities; if the exchange is treated as a taxable disposition for U.S. federal income tax purposes, a holder's initial tax basis of the New Convertible Notes received generally would be equal to their issue price and a holder's initial tax basis of the New Shares received would be their fair market value on the date of the exchange. In addition, the issue price of the New Convertible Notes received in the exchange will be determined pursuant to section 1273 and Treas. Reg. §1.1273-2.

Form 8937, Part II, Line 17

Sections 354, 358, 368, 1001, 1012 and 1273, and Treas. Reg. §§ 1.1001-1(a), 1.1001-3, and 1.1273-2.

Form 8937, Part II, Line 18

As discussed above, the exchange of Existing Convertible Notes for Offered Securities pursuant to the Exchange Offer may be treated as a taxable disposition for U.S. federal income tax purposes, in which case a holder subject to U.S. federal income taxation will generally be required to recognize any gain or loss on the exchange.

Alternatively, the exchange may be treated as a recapitalization for U.S. federal income tax purposes, in which case no loss would be recognized, and the holder may not be required to recognize the entire amount of any gain.

A holder should consult its tax advisor to determine the extent to which it will be required to recognize any gain, or permitted to recognize any loss, on the exchange of the Existing Convertible Notes for the Offered Securities (including the Early Exchange Premium and the SteerCo Premium) pursuant to the Exchange Offer.

Form 8937, Part II, Line 19

The reportable tax year is 2025 for taxpayers reporting taxable income on a calendar year basis.

The information contained herein does not constitute tax advice and is intended to provide only a general summary and is not intended to be a complete analysis or description of all potential U.S. federal income tax consequences of the transactions described herein. Moreover, the discussion set forth above does not address tax consequences that may vary with, or are dependent on, individual circumstances. Shareholders and security holders are urged to consult with their own tax advisors with respect to the tax consequences of the transactions described herein as applicable to their particular circumstances.