

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 Attachment A, Item 17.

18 Can any resulting loss be recognized? ▶ See Attachment A, Item 18.

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

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 ▶ 4/5/17

Print your name ▶ Christopher Digan Title ▶ Vice-President

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.	

Computer Sciences Corporation
EIN 95-2043126
Form 9837
Report of Organizational Actions Affecting Basis in Securities
Attachment A, Page 1

Item 14

Effective April 1, 2017, pursuant to the Agreement and Plan of Merger dated as of May 24, 2016, among Hewlett Packard Enterprise Company ("Houston"), Everett SpinCo, Inc. ("Everett"), Computer Sciences Corporation ("Chicago"), Everett Merger Sub Inc. and New Everett Merger Sub Inc. ("Merger Sub"), as amended as of November 2, 2016, as further amended as of December 6, 2016, and as may be further amended from time to time, Merger Sub merged with and into Chicago (the "Merger"), with Chicago surviving the Merger as a wholly owned subsidiary of Everett.

Pursuant to the Merger, each outstanding common share of Chicago was exchanged for one (1) common share of Everett stock. No cash or other consideration was received in exchange for Chicago common stock.

Item 15

The Merger is treated as an exchange of existing Chicago common stock for Everett common stock in a reorganization under Internal Revenue Code ("Code") Section 368(a)(1)(A). A U.S. holder of Chicago common stock will have an aggregate tax basis in the common stock of Everett received in the exchange equal to such holder's aggregate tax basis in the Chicago common stock surrendered in the exchange.

Further discussion of the material U.S. federal income tax consequences of the Merger is set forth under the heading "U.S. Federal Income Tax Consequences of the Distribution and Merger" in the definitive Proxy Statement filed with the Securities and Exchange Commission on February 27, 2017.

Shareholders should consult with a qualified tax advisor for questions regarding their specific tax treatment.

Item 16

A U.S. holder of Chicago common stock will have an aggregate tax basis in the common stock of Everett received in the exchange equal to such holder's aggregate tax basis in the Chicago common stock surrendered in the exchange.

Item 17

Code sections 354(a), 358(a) and 368(a).

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Report of Organizational Actions Affecting Basis in Securities
Attachment A, Page 2

Item 18

No shareholder may recognize a loss as a result of the Merger.

Item 19

The tax consequences of the Merger are taken into account in the tax year of each former Chicago shareholder that includes April 1, 2017 (*e.g.*, 2017 for calendar year taxpayers).