

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.

Blank lines for listing Internal Revenue Code sections.

18 Can any resulting loss be recognized? ▶ Please see attachment.

Blank lines for providing information on resulting loss recognition.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ Please see attachment.

Blank lines for providing other necessary information.

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 ▶ Iain Brown Date ▶ NOVEMBER 21, 2023

Print your name ▶ Iain Brown Title ▶ Chief Financial Officer

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.

Alkermes plc

EIN: 98-1007018

ATTACHMENT TO IRS FORM 8937 – PART II
REPORT OF ORGANIZATIONAL ACTIONS AFFECTING BASIS OF SECURITIES

CONSULT YOUR TAX ADVISOR

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 U.S. federal income tax laws and regulations relating to the effects of the Distribution (as defined below) on the tax basis of Alkermes plc (“Parent”) ordinary shares and the allocation of tax basis between the ordinary shares of Parent and Mural Oncology plc (“SpinCo”) following the Distribution. The information contained herein does not constitute tax advice and does not purport to be complete or to describe the consequences that may be relevant to particular holders in light of their particular circumstances or to holders subject to special rules under the Code (including, but not limited to, insurance companies, tax-exempt organizations, financial institutions, broker-dealers, partners in partnerships (or entities or arrangements treated as partnerships for U.S. federal income tax purposes) that hold Parent ordinary shares, pass-through entities (or investors therein), traders in securities who elect to apply a market-to-market method of accounting, shareholders who hold Parent ordinary shares as part of a “hedge,” “straddle,” “conversion,” “synthetic security,” “integrated investment,” or “constructive sale transaction,” individuals who receive Parent or SpinCo ordinary shares upon exercise of employee stock options or otherwise as compensation, holders that receive SpinCo ordinary shares with respect to Parent ordinary shares that were acquired from Parent for cash within 90 days of the distribution of SpinCo ordinary shares, holders who are liable for the alternative minimum tax or any holders who actually or constructively own 5% or more of Parent’s ordinary shares). You are urged to consult your tax advisor regarding the particular consequences of the Distribution to you, including the applicability and effect of all U.S. federal, state and local, and non-U.S. tax laws. We urge you to read the registration statement on Form 10 of SpinCo, as filed with the Securities and Exchange Commission on October 10, 2023 (the “Form 10”), as amended, noting especially the discussion under the heading “Material U.S. Federal Income Tax Consequences.” You may access the Form 10 at www.sec.gov.

This notice does not apply to Parent ordinary shares sold, exchanged, or otherwise disposed of prior to the time of the Distribution.

14. Describe the organization action, and, if applicable, the date of the action or the date against which shareholders’ ownership is measured for the action:

On November 15, 2023, pursuant to the terms and conditions of the Separation Agreement dated November 13, 2023, by and between Parent and SpinCo, Parent distributed to its shareholders 100 percent of the outstanding ordinary shares of SpinCo (the “Distribution”). Parent shareholders also received cash in lieu of any fractional ordinary shares of SpinCo. Following,

and as a result of, the Distribution, (i) Parent owns no shares of SpinCo, and (ii) SpinCo is a separate public company.

SpinCo's ordinary shares commenced regular way trading under the symbol "MURA" on the NASDAQ Global Market on November 16, 2023. Following the Distribution, Parent will continue to trade on the NASDAQ Global Select Market under its existing symbol, "ALKS."

Each Parent shareholder received one SpinCo ordinary share for every ten Parent ordinary shares held as of the close of business on November 6, 2023, the record date for the Distribution, and cash in lieu of any fractional ordinary shares of SpinCo that such Parent shareholder would have received after application of the above ratio.

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:

For U.S. federal income tax purposes, generally, the aggregate tax basis of the Parent ordinary shares and SpinCo ordinary shares received in the Distribution (including any fractional share interest in SpinCo ordinary shares for which cash is received) in the hands of each holder of Parent ordinary shares immediately after the Distribution will equal the aggregate tax basis of Parent ordinary shares held by such holder immediately before the Distribution, allocated between the Parent ordinary shares and the SpinCo ordinary shares (including any fractional share interest in SpinCo ordinary shares for which cash is received) in proportion to the relative fair market value of each on the date of the Distribution. Shareholders that acquired Parent ordinary shares at different times or different prices should calculate their tax basis in each block of acquired ordinary shares and then allocate a portion of that tax basis to the Parent ordinary shares and the SpinCo ordinary shares with respect thereto.

There are several possible methods for determining the fair market values of Parent ordinary shares and SpinCo ordinary shares. One possible approach is to utilize the NASDAQ market closing price on November 16, 2023 for Parent ordinary shares (\$23.37 per share), and the NASDAQ market closing price on November 16, 2023 for SpinCo ordinary shares (\$3.80 per share) as an indication of the fair market value. Based on that approach and the assumptions and calculations set forth in Item 16 below, 98.40% of a Parent shareholder's aggregate tax basis in his or her Parent ordinary shares prior to the Distribution would be allocated to such shareholder's Parent ordinary shares and 1.60% would be allocated to such shareholder's SpinCo ordinary shares. You are not bound by this approach and may, in consultation with your tax advisor, use another approach in determining the fair market values for Parent ordinary shares and SpinCo ordinary shares. You should consult your tax advisor to determine what measure of fair market value is appropriate.

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:

The example provided below is for illustrative purposes only and is provided pursuant to Section 6045B of the Code as a convenience to shareholders and their tax advisors when establishing their specific tax position. This example should not be used for any tax reporting purpose.

The following is an example of how the previously described approach to basis allocation would be applied:

Assumptions

- *Number of Parent ordinary shares owned: 5,000*
- *Parent shareholder has uniform tax basis in its ordinary shares (i.e., no basis “blocks”)*
- *Parent shareholder’s aggregate tax basis in its ordinary shares (assumed to be \$25 per share): \$125,000*
- *Number of SpinCo ordinary shares received in the Distribution (5,000 Parent ordinary shares multiplied by the distribution ratio of 1/10): 500*
- *Parent ordinary shares NASDAQ closing price following the Distribution: \$23.37 per share*
- *SpinCo ordinary shares NASDAQ closing price following the Distribution: \$3.80 per share*

Tax basis allocation:

	# shares owned	Assumed beginning tax basis (A)	Assumed FMV price per share	FMV of shares owned post Distribution	Percentage of total FMV (B)	Allocated tax basis = (A) x (B)
Parent ordinary shares	5,000	\$125,000.00	\$23.37	\$116,850.00 ¹	98.40% ³	\$123,000.00
SpinCo ordinary shares	500		\$3.80	\$1,900.00 ²	1.60% ⁴	\$2,000.00
Total				\$118,750.00	100%	\$125,000.00
¹ 5,000 shares x \$23.37 ² 500 shares x \$3.80 ³ \$116,850/\$118,750 ⁴ \$1,900/\$118,750						

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

Parent shareholders generally will not recognize income, gain or loss for U.S. federal income tax purposes on the receipt of SpinCo ordinary shares in the Distribution, pursuant to Sections 355(a) and 368(a)(1)(D) of the Code.

Under Sections 1001 and 1221 of the Code, in general, the receipt by Parent shareholders of cash in lieu of a fractional ordinary share of SpinCo will be treated as if the fractional ordinary share had been distributed to Parent shareholders in the Distribution and then had been disposed of by such shareholders (in a sale or exchange) for the amount of such cash.

Under Section 1223(1) of the Code, the holding period of a Parent shareholder in shares of SpinCo ordinary shares received in the Distribution includes the holding period of the pre-Distribution Parent ordinary shares with respect to which the Distribution of SpinCo ordinary shares was made. The tax basis calculations resulting from the Distribution are governed by Section 358 of the Code.

You should consult your tax advisor as to the particular consequences of the Distribution to you, including the applicability and effect of any U.S. federal, state, and local tax laws, as well as non-U.S. tax laws, which may result in the Distribution being taxable to you.

18. Can any resulting loss be recognized?

No loss may be recognized by a Parent shareholder upon the receipt of a SpinCo ordinary share in the Distribution, except possibly with respect to cash received in lieu of a fractional ordinary share of SpinCo.

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

The Distribution was effective November 15, 2023. For a Parent shareholder whose taxable year is a calendar year, the reportable tax year is 2023.