

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 statement.**

Horizontal lines for listing Internal Revenue Code sections.

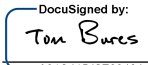
18 Can any resulting loss be recognized? ▶ **See attached statement.**

Horizontal lines for providing information regarding loss recognition.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ **See attached statement.**

Horizontal 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 ▶  Date ▶ 5/30/2024
Print your name ▶ **Thomas Bures** Title ▶ **CFO**

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.			

Pieris Pharmaceuticals, Inc.
EIN:30-0784346
Attachment to Form 8937 – 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:

Pieris Pharmaceuticals, Inc. (the "Company") effectuated a reverse stock split at a ratio of 1-for-80 effective at 5:00 PM EST on Monday, April 22, 2024. The Company's common stock began trading on the Nasdaq Capital Market on a reverse-split adjusted basis at the market open on Tuesday, April 23, 2024 under the Company's existing trading symbol, "PIRS" with a new CUSIP number of 720795202.

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:

On the effective date, the total number of shares of common stock held by each stockholder of the Company was converted automatically into the number of shares of common stock equal to: the number of issued and outstanding shares of common stock held by each such stockholder immediately prior to the reverse stock split divided by 80. Any fractional share of common stock that would otherwise result from the reverse stock split were rounded up to a whole share and, as such, any stockholder who otherwise would have held a fractional share after giving effect to the reverse stock split will instead hold one whole share of the post-reverse stock split common stock after giving effect to the reverse stock split. As a result, no fractional shares were issued in connection with the reverse stock split and no cash or other consideration was paid in connection with any fractional shares that would otherwise have resulted from the reverse stock split.

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:

It is not intended that there is a change in aggregate basis for the U.S. taxpayer since there is no cost to each person to acquire the fractional shares. The data and calculation to support this are described in Line 15 above.

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

It is intended that the reverse stock split constitute a "recapitalization" within the meaning of Section 368(a)(1)(E) of the Internal Revenue Code and the descriptions in this form assume that the reverse stock split so qualifies.

Line 18: Can any resulting loss be recognized?

Shareholders generally should not recognize gain or loss upon the reverse stock split, other than in connection with cash received in lieu of a fractional share to the extent that the tax basis

allocable to such fractional share exceeds the amount of cash received for such fractional share. No cash was received by shareholders as a result of the reverse stock split.

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

The reportable tax year is the year that includes April 22, 2024. For calendar year taxpayers, the reportable tax year is 2024.