► See separate instructions.

Part Reporting	Issuer					
1 Issuer's name		2 Issuer's employer identification number (EIN) 98-0231912				
Bunge Limited						
3 Name of contact for add	ditional information	4 Telephone No. of contact		5 Email address of contact		
Ruth Ann Wisener		314.	-292-2000	Ruthann.Wisener@Bunge.com		
6 Number and street (or F	P.O. box if mail is not d			7 City, town, or post office, state, and ZIP code of contact		
Clarendon House, 2 Church Street		9 Classification and description		Hamilton, Bermuda HDMX		
8 Date of action		9 Classification	and description			
October 31, 2023		See Attachment				
10 CUSIP number	11 Serial number(s)	12 Ti	cker symbol	13 Account number(s)		
See Attachment	NA	BG		NA		
			nents if needed. Se	ee back of form for additional questions.		
the action ► See Att				te against which shareholders' ownership is measured for		
15 Describe the quantitat share or as a percenta			ne basis of the securi	ity in the hands of a U.S. taxpayer as an adjustment per		
I6 Describe the calculation valuation dates ► See		is and the data that	supports the calcula	ation, such as the market values of securities and the		
For Paperwork Reduction A	Act Notice, see the se	parate Instruction	s.	Cat No 37752P Form <b>8937</b> (12-201)		

Form	8937	(12-20	17)
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Part	1	Organizational Action (continued)			
rait		erganizational Action (continued)	, 		
<b>17</b> L	list the	applicable Internal Revenue Code section	i(s) and subsection(s) upon which the tax t	reatment is based	See Attachment
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10 7	on	v repulting loss he recognized to the			
18 C	an ang	y resulting loss be recognized?  See At			
		-			
40 D	rovido	any other information necessary to impler	nent the adjustment, such as the reportabl	a tay waar b. Cas. A	
<b>19</b> P	rovide	any other mornation necessary to impler	nent the adjustment, such as the reportabl	e lax year <b>&gt;</b> <u>See A</u>	
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			· · · · · · · · · · · · · · · · · · ·		
	Linda	r penalties of perjury, I declare that I have exam	bined this return including accompanying school	lules 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 inform	nation of which prepa	rer has any knowledge.
Sign		n			
Sign				111	12.22
Here	Signa	ture		Date	1 / 2023
		~			/
	Print	your name 🕨 Rajat Gupta		Title Treasurer	
	<u> </u>	Print/Type preparer's name	Preparer's signature	Date	
Paid					Check if self-employed
Prepa			L	l	
Use (	Dnly	Firm's name	· · · · · · · · · · · · · · · · · · ·		Firm's EIN ►
		Firm's address ►			Phone no.
Send Fo	orm 89	37 (including accompanying statements) t	o: Department of the Treasury, Internal Rev	venue Service, Ogd	en, UT 84201-0054

Attachment to Form 8937-Report of Organizational Actions Affecting Basis of Securities

Bunge Limited (NYSE: BG) EIN: 98-0231912

The information in this document is intended to comply with IRC Section 6045B. However, the information contained herein does not constitute tax advice and does not purport to consider any shareholder's particular circumstances and is not intended or written for the purpose of avoiding penalties under the Internal Revenue Code. Each shareholder is advised to consult his or her tax advisor regarding the tax treatment of the transaction. Further discussion of the tax consequences of the transaction can be found in the Definitive Proxy Statement on Schedule 14A filed by Bunge Limited with the Securities and Exchange Commission on August 7, 2023 under the heading "Certain Tax Considerations Of The Redomestication."<sup>1</sup>

Part I, Box 9: Classification and description

Common Stock

Part I, Box 10: CUSIP number

G16962105

**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

In February 2023, Bunge Global SA, a Swiss corporation, was incorporated as a direct, wholly owned subsidiary of Bunge Limited. Thereafter, Bunge Global SA formed Horizon Merger Company Limited, a new Bermuda subsidiary. On October 31, 2023, Horizon Merger Company Limited merged with Bunge Limited by way of a Bermuda law scheme of arrangement, with Bunge Limited as the surviving company (the "<u>Reorganization</u>") and, as a result of the Reorganization, Bunge Limited became a direct, wholly owned subsidiary of Bunge Global SA and the shareholders of Bunge Limited's common stock received one share of Bunge Global SA common stock for each share of Bunge Limited common stock held by them; and Bunge Limited made a U.S. federal tax entity classification election to be classified as disregarded from its sole owner Bunge Global SA, effective November 1, 2023.

**Part II, 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

Pursuant to Section 358 of the Internal Revenue Code, a shareholder's tax basis in each share of Bunge Global SA common stock received in the Reorganization should equal the shareholder's tax basis of the share of Bunge Limited common stock exchanged therefor.

<sup>&</sup>lt;sup>1</sup> The definitive proxy statement is available at:

https://www.sec.gov/Archives/edgar/data/1144519/000110465923088116/tm2318462-10\_defm14a.htm#tCTCO1

Shareholders who held shares of Bermuda Limited common stock with differing bases are urged to consult their tax advisors with regard to identifying the bases of the particular shares of Bunge Global SA common stock received in the Reorganization.

**Part II, 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

Because, in the Reorganization, the Bunge Limited shareholders exchanged their shares of Bunge Limited common stock for shares of Bunge Global SA common stock on a one-for-one basis, a shareholder's basis in each share of Bunge Global SA common stock received in the Reorganization is the same as the basis in each share of Bunge Limited common stock surrendered therefor pursuant to Treas. Reg. §1.358-2(a)(2) (requiring basis blocks in surrendered shares to be maintained in shares received to the greatest extent possible).

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

368(a)(1)(F) – Reorganization via Change in Place of Organization 354(a) – Exchange of Stock in certain Reorganizations 358(a)(1) / 358(b)(1) – Basis to Distributees

Part II, Line 18: Can any resulting loss be recognized

No, pursuant to Section 354(a)(1) of the Internal Revenue Code, no loss to a shareholder of Bunge Limited should be allowed with respect to its shares of Bunge Limited common stock.

Holders should consult their own tax advisors regarding the tax consequences of the Reorganization.

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

The Reorganization occurred on October 31, 2023. Therefore, the taxable year of a shareholder of Bunge Limited common stock for reporting the transaction is its taxable year that includes October 31, 2023.