

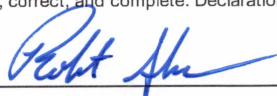
Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶
See Attachment

18 Can any resulting loss be recognized? ▶
See Attachment

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

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 ▶ 02/20/2020

Print your name ▶ Robert Shannon Title ▶ EVP & CAO

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.

Permian Resources Corporation

EIN: 41-3338782

Attachment to IRS Form 8937

Report of Organizational Actions Affecting Basis of Securities

This attachment includes a general summary regarding the application of certain U.S. federal income tax laws and Treasury regulations relating to the effects of the transactions described below.

The information provided on Form 8937 and in this attachment is being provided pursuant to the requirements of Section 6045B of the Internal Revenue Code of 1986, as amended (“IRC”). The information provided on Form 8937 and in this attachment is based on the intended tax treatment of the transactions as described on Line 15 below, and neither constitutes tax advice nor purports to be complete or to describe the consequences that may apply to particular stockholders or unitholders. Neither Permian Resources Corporation (f/k/a PRC NewCo Inc) (“New PR”) nor Permian Resources Holdings Inc. (f/k/a Permian Resources Corporation) (“Old PR”) provides tax advice to their stockholders or to unitholders of OpCo (as defined below). Stockholders and unitholders are urged to consult their own tax advisors regarding the consequences of the transactions described below, including the applicability and effect of all U.S. federal, state and local and non-U.S. tax laws. Stockholders and unitholders are encouraged to refer to the Master Reorganization Agreement dated December 22, 2025 and its exhibits (the “Reorganization Agreement”), a copy of which was filed as Exhibit 2.1 to Old PR’s Current Report on Form 8-K filed with the U.S. Securities and Exchange Commission on December 22, 2025, and to other filings by New PR and Old PR available at www.sec.gov.

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:

On January 7, 2026, New PR completed the transactions contemplated by the Reorganization Agreement, pursuant to which, among other things, (i) a newly-formed wholly owned subsidiary of New PR merged with and into Old PR, with Old PR surviving the merger as a wholly owned subsidiary of New PR (the “Merger”), and (ii) immediately prior to the Merger, certain holders (the “Electing Holders”) of units in Permian Resources Operating, LLC (“OpCo” and such units, “OpCo Units”) surrendered all of their shares of Old PR’s Class C Common Stock, par value \$0.0001 per share (“Old PR Class C Shares”), for no consideration, and Old PR cancelled all such surrendered shares effective immediately prior to the effective time of the Merger (the “**Class C Share Surrender**”).

Pursuant to the Merger, each share of Old PR's Class A Common Stock, par value \$0.0001 per share ("Old PR Class A Shares" and, together with the Old PR Class C Shares, the "Old PR Common Shares"), that was issued and outstanding immediately prior to the effective time of the Merger was exchanged for one share of New PR's Class A Common Stock, par value \$0.0001 per share ("New PR Class A Shares"), which has the same designations, rights, powers and preferences, and qualifications, limitations and restrictions, as an Old PR Class A Share.

Pursuant to the Merger, each Old PR Class C Share that was issued and outstanding immediately prior to the effective time of the Merger (after giving effect to the Class C Share Surrender) was exchanged for one share of New PR's Class C Common Stock, par value \$0.0001 per share ("New PR Class C Shares" and, together with the New PR Class A Shares, "New PR Common Shares"), which has the same designations, rights, powers and preferences, and qualifications, limitations and restrictions, as an Old PR Class C Share.

In connection with the Merger, the Electing Holders exchanged all of their OpCo Units for newly issued New PR Class A Shares on a one-for-one basis (the "OpCo Unit Exchange").

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:

For U.S. federal income tax purposes, it is intended that (i) the Merger qualify as a "reorganization" within the meaning of IRC Section 368(a) and (ii) the Merger and the OpCo Unit Exchange, taken together, qualify as a transaction described in IRC Section 351.

For U.S. federal income tax purposes, the aggregate and per-share tax basis of the New PR Class A Shares received by former holders of Old PR Class A Shares in the Merger is expected to equal the aggregate and per-share adjusted tax basis of the Old PR Class A Shares surrendered by each such holder in the Merger.

For U.S. federal income tax purposes, the aggregate and per-share tax basis of the New PR Class C Shares received by former holders of Old PR Class C Shares (other than the Electing Holders) in the Merger is expected to equal the aggregate and per-share adjusted tax basis of the Old PR Class C Shares surrendered by each such holder in the Merger.

Because the Electing Holders received no consideration for the Old PR Class C Shares they surrendered in the Class C Share Surrender and the Electing Holders generally had zero adjusted tax basis in their Old PR Class C Shares, it is intended that the Electing Holders generally will not recognize gain or loss as a result of the Class C Share Surrender.

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

The aggregate tax basis of the New PR Common Shares received in the Merger is expected to equal the aggregate adjusted tax basis of the Old PR Common Shares exchanged therefor in the Merger.

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

With respect to the Merger, IRC Sections 351, 354, 358, 368(a), and 1223.

With respect to the Class C Share Surrender, IRC Sections 302 and 1001.

Line 18 - Can any resulting loss be recognized?

Holders of Old PR Common Shares generally may not recognize loss for U.S. federal income tax purposes as a result of the Merger.

Electing Holders are not expected to recognize loss as a result of the Class C Share Surrender.

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

The transactions contemplated by the Reorganization Agreement were effective on January 7, 2026. For a stockholder whose taxable year is the calendar year, the reportable tax year is 2026.