Form **8937**

(December 2017)
Department of the Treasury
Internal Revenue Service

Report of Organizational Actions Affecting Basis of Securities

► See separate instructions.

OMB No. 1545-0123

P	art Reporting	Issuer					
1	1 Issuer's name				2 Issuer's employer identification number (EIN)		
LIB	BERTY GLOBAL LTD.		98-1750381				
			4 Telephon	e No. of contact	5 Email address of contact		
	/ESTOR RELATIONS	0 hav if il i	-1-1:	303-220-6600	ir@ libertyglobal.com		
6 Number and street (or P.O. box if mail is not delivered to street address) of contact					7 City, town, or post office, state, and ZIP code of contact		
CL	LARENDON HOUSE, 2 CHURCH STREET			HAMILTON, HM11, BERMUDA			
8	Date of action						
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	the action ► SEE ST	ATEMENT					
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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 ► SEE STATEMENT							
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16	Describe the calculati valuation dates ► SEI	on of the change in t	pasis and the	data that supports the calc	culation, such as the market values of securities and the		
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Cat. No. 37752P

Part	III	Organizational Action (continue	d)		
17		applicable Internal Revenue Code secti		h the tax treatment is based	SEE STATEMENT
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18 (Can an	y resulting loss be recognized? ► SEE	STATEMENT		
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19	Provide	any other information necessary to imp	lement the adjustment, such as th	e reportable tax year ► SEE	STATEMENT
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	Unde	er penalties of perjury, I declare that I have ex f, it is true, correct, and complete. Declaration	xamined this return, including accomp	anying schedules and statements	s, and to the best of my knowledge and arer has any knowledge.
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Paid		Print/Type preparer's name	Preparer's signature	Date	Check if PTIN
	arer				self-employed
	Only	Firm's name ▶			Firm's EIN ▶
Sand F	orm 80	Firm's address >	s) to: Department of the Tressure	Internal Revenue Service Co	Phone no.

LIBERTY GLOBAL LTD.

EIN: 98-1750381

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

The information contained herein is being provided pursuant to the requirements of Section 6045B of the Internal Revenue Code of 1986, as amended. The information in this document does not constitute tax advice and should not be construed to take into account any shareholder's specific circumstances.

Holders and nominees should consult their own tax advisors regarding the particular tax consequences of the organizational action (as described in this document) to them, including the applicability and effect of all U.S. federal, state, and local and foreign tax laws.

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.

On November 8, 2024 (the "**Distribution Date**"), Liberty Global Ltd. ("**Liberty Global**") completed a series of transactions, including certain internal reorganization transactions and reduction in its share premium, that resulted in a transfer of 100% of the outstanding shares of Sunrise Communications AG ("**Sunrise**") pro rata to Liberty Global shareholders of record as of the close of business on November 4, 2024 (the "**Record Date**," and such distribution, the "**External Spin**"). For Liberty Global Class A Common Shares and Liberty Global Class C Common Shares, each shareholder who held either of these shares on the Record Date and did not sell them before the close of business on the Distribution Date received one Sunrise Class A Common Share, in the form of one Sunrise Class A American Depository Shares ("**Sunrise Class A ADS**"), for every five Liberty Global Class A Common Shares or Liberty Global Class C Common Shares owned on the Record Date. For Liberty Global Class B Common Shares, each shareholder who held shares on the Record Date and did not sell them before the close of business on the Distribution Date received two Sunrise Class B Common Share, in the form of two Sunrise Class B American Depository Shares ("**Sunrise Class B ADS**").

No fractional shares of Sunrise common stock were distributed. All fractional shares of Sunrise common stock that Liberty Global shareholders otherwise would have been entitled to receive as a result of the External Spin were aggregated into whole shares and sold on the open market, and the resulting cash proceeds of the sale were paid pro rata to such shareholders.

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.

As a result of the External Spin, each Liberty Global Class C shareholder will be required to allocate their aggregate tax basis in their Liberty Global Class C Common Shares held immediately prior to the External Spin among (i) the Sunrise Class A ADS received in the External Spin (including any fractional Sunrise Class A ADS for which cash was received) and (ii) the Liberty Global Class C Common Shares in respect of which such Sunrise Class A ADS were received, in proportion to their relative fair market values immediately after the External Spin. Accordingly, the aggregate basis of the Liberty Global Class C Common Share and the Sunrise Class A ADS in the hands of Liberty Global Class C shareholders immediately after the External Spin is expected to be the same as the Liberty Global Class C shareholders' basis in their Liberty Global Class C Common Shares immediately before the External Spin.

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.

U.S. federal income tax laws provide that the allocation of the aggregate tax basis discussed under Line 15 above be based on the respective fair market values of the resulting Liberty Global Class C Common Share and Sunrise Class A ADS held following the External Spin. The U.S. federal income tax laws do not, however, provide further guidance on the determination of fair market value. Liberty Global shareholders should consult their own tax advisors to determine the appropriate fair market values.

One method to determine fair market value is to use the NASDAQ closing prices of a Liberty Global Class C Common Share and the NASDAQ closing prices of a Sunrise Class A ADS on November 13, 2024, the first trading day after the Distribution Date. For example, the allocation of tax basis between a Liberty Global Class C Common Share and a Sunrise Class A ADS can be achieved by:

	Date	NASDAQ Closing Price	Shares	Total Value	Percentage Allocation
LBTYK	Nov. 13, 2024	\$ 12.21	1	\$ 12.21	57.459%
SNRE	Nov. 13, 2024	\$ 45.20	0.2*	\$ 9.04	42.541%

Liberty Global Class C shareholders who acquired blocks of Liberty Class C Common Shares at different times or at different prices should consider performing the foregoing allocation separately with respect to each block of Liberty Class C Common Shares in consultation with their own tax advisors. Other valuation methodologies may exist, and shareholders are urged to consult their tax advisors regarding these tax basis allocation calculations. Liberty Global Class C shareholders are not bound by the approach illustrated above and may, in consultation with their own tax advisors, use another approach in determining fair market values for Liberty Global Class C Common Shares and Sunrise Class A ADS.

^{*} Based on 5 Liberty Global Class C Common Shares for each Sunrise Class A ADS for ratio of 0.2 for each individual Liberty Global Class C Common Share

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

The applicable sections of the Internal Revenue Code of 1986, as amended upon which the tax treatment is based are sections 355, 358, 368, 1001, and 1223.

Line 18 - Can any resulting loss be recognized?

Generally, no gain or loss should be recognized for U.S. federal income tax purposes as the result of the External Spin. A Liberty Global Class C shareholder who received cash in lieu of a fractional share of Sunrise Class A ADS recognizes gain or loss equal to the difference between the amount of cash received and the tax basis in the fractional share. The deductibility of capital losses may be subject to limitations.

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

The External Spin occurred on the Distribution Date. As a result, the basis adjustment in the Liberty Global Class C Common Shares and Sunrise Class A ADS should be reported in the taxable year that includes this date. In the case of shareholders who are calendar year taxpayers, the External Spin is reportable in the tax year ending December 31, 2024.