



**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.](#)

Horizontal lines for providing the applicable Internal Revenue Code section(s) and subsection(s).

18 Can any resulting loss be recognized? ▶ [See attached.](#)

Horizontal lines for providing information regarding the recognition of a resulting loss.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ [See attached.](#)

Horizontal lines for providing any other information necessary to implement the adjustment.

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 ▶ *David Obstler* Date ▶ 6/3/2026  
DocuSigned by:  
464CEF92E6B74AC...  
Print your name ▶ **David Obstler** Title ▶ **CFO**

|                               |                            |                      |      |   |              |
|-------------------------------|----------------------------|----------------------|------|---|--------------|
| <b>Paid Preparer Use Only</b> | 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.    |

**Datadog, Inc.**  
**EIN: 27-2825503**  
**Attachment to Form 8937**  
**Report of Organizational Actions Affecting Basis of Securities**

**Disclaimer:** *The information in Form 8937 and this attachment does not constitute tax advice. The information contained herein is being provided pursuant to the requirements of Section 6045B of the Internal Revenue Code of 1986, as amended (the "IRC"). The U.S. federal income tax discussion below is included for general information purposes only and is not a complete analysis or discussion of all potential tax consequences that may be relevant to a particular holder of Delaware Corporation Class A Common Stock or Delaware Corporation Class B Common Stock (each, as defined below). Each holder should consult their tax advisors as to the specific tax consequences resulting from the Redomiciliation (as defined below).*

**Form 8937, Part I, Boxes 9, 10, and 12:**

| Description                               | CUSIP     | Ticker Symbol |
|---|-----------|---------------|
| Delaware Corporation Class A Common Stock | 23804L103 | DDOG          |
| Delaware Corporation Class B Common Stock | N/A       | N/A           |

**Form 8937, Part II, Box 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 April 21, 2026 (the "Effective Time"), Datadog, Inc., a Delaware corporation ("Delaware Corporation") redomiciled from Delaware to Nevada by means of a statutory conversion and became Datadog, Inc, a Nevada corporation ("Nevada Corporation", and such conversion, the "Redomiciliation"). The Redomiciliation changed the Company's jurisdiction of incorporation, governing corporate law, and organizational documents from Delaware to Nevada. At the Effective Time, each outstanding share of Delaware Corporation class A common stock ("Delaware Corporation Class A Common Stock") and Delaware class B common stock ("Delaware Corporation Class B Common Stock") automatically converted into one share of Nevada Corporation class A common stock ("Nevada Corporation Class A Common Stock") or Nevada Corporation class B common stock ("Nevada Corporation Class B Common Stock"), respectively.

**Form 8937, Part II, Box 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**

The Redomiciliation is expected to qualify as a “reorganization” under IRC Section 368(a)(1)(F). The tax basis of each share of Nevada Corporation Class A or Class B Common Stock received is expected to equal the tax basis of the share converted therefor.

**Form 8937, Part II, Box 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**

See response to Box 15, above.

**Form 8937, Part II, Box 17: List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based**

Sections 354, 358, and 368.

**Form 8937, Part II, Box 18: Can any resulting loss be recognized?**

As described in the response to Box 15, the Redomiciliation is expected to be a “reorganization” under IRC Section 368(a)(1)(F). Accordingly, it is expected that holders will not recognize gain or loss as a result of the Redomiciliation.

**Form 8937, Part II, Box 19: Provide any other information necessary to implement the adjustment, such as the reportable tax year**

The Redomiciliation became effective on the Effective Time. Consequently, the reportable taxable year for reporting the tax effect of the Redomiciliation for any holders is the taxable year that includes the Effective Time.