

Form **8937**
 (December 2017)
 Department of the Treasury
 Internal Revenue Service

**Report of Organizational Actions
 Affecting Basis of Securities**

OMB No. 1545-0123

▶ See separate instructions.

Part I Reporting Issuer

| | | | |
|--|--|--|-----------------------------|
| 1 Issuer's name <u>Edwards Lifesciences Corporation</u> | | 2 Issuer's employer identification number (EIN) <u>36-4316614</u> | |
| 3 Name of contact for additional information <u>Investor Relations</u> | 4 Telephone No. of contact <u>(949) 250-2806</u> | 5 Email address of contact <u>investor_relations@edwards.com</u> | |
| 6 Number and street (or P.O. box if mail is not delivered to street address) of contact <u>One Edwards Way</u> | | 7 City, town, or post office, state, and ZIP code of contact <u>Irvine, California 92614</u> | |
| 8 Date of action <u>May 29, 2020</u> | | 9 Classification and description <u>Common Stock</u> | |
| 10 CUSIP number <u>28176E108</u> | 11 Serial number(s) | 12 Ticker symbol <u>EW</u> | 13 Account number(s) |

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

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 May 7, 2020, the Board of Directors of Edwards Lifesciences Corporation declared a 3-for-1 stock split of the Company's common shares effected in the form of a stock dividend. Each shareholder of record on the close of business on the record date received two additional shares of common stock for each share held. The record date for the split was May 18, 2020 and the new shares were distributed on May 29, 2020.

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 stock split was non-taxable under Internal Revenue Code Section 305(a) and accordingly a stockholder's basis is allocated under Internal Revenue Code Section 307(a). Under Internal Revenue Code Section 307(a), each stockholder will allocate its basis in each share owned prior to the stock split (i) one third to the share owned prior to the stock split and (ii) one third to each of the two new shares received in the split in respect of that share. As a result, the number of shares held by each shareholder were multiplied by 3 but each shareholder's total basis and proportionate interest in the Company remained the same.

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 ▶ For each share held as of the record date, the stockholder will receive two identical shares. A shareholder will multiply the basis in each share held before the stock split by 3 1/3% to determine the basis, after the stock split, in that share and each additional share distributed in the stock split. The record date for the split was May 18, 2020 and the distribution date was May 29, 2020. The data that supports this calculation is each shareholder's basis immediately before the distribution and the number of shares issued in the distribution.

Part II Organizational Action (continued)

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

The applicable Internal Revenue Code sections upon which the tax treatment is based are Internal Revenue Code Sections 305(a) and 307(a). Under Internal Revenue Code Section 305(a), the distribution is not taxable to the shareholders. Under Internal Revenue Code Section 307(a), each shareholder's basis in existing stock must be allocated between the existing stock and the new stock that was distributed in the stock split.

18 Can any resulting loss be recognized? ▶ For U.S. federal income tax purposes, there will be no U.S. taxable income, gain or loss in connection with the stock split.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ _____
The reportable tax year is 2020 for stockholders reporting on a calendar year basis. For stockholders reporting on a basis other than a calendar year, the reportable year is the stockholder's tax year that includes May 29, 2020.

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 ▶ *Edward A. Tarle* Date ▶ 7/13/2020
DocuSigned by:
27AC82A544BD420...
Print your name ▶ Edward A. Tarle Title ▶ Vice President, Tax

| | | | | | |
|-------------------------------|----------------------------|----------------------|------|---|--------------|
| 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. |