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

Part I Reporting Issuer

1 Issuer's name Predictive Discovery Limited		2 Issuer's employer identification number (EIN) NONE
3 Name of contact for additional information Matthew Foy	4 Telephone No. of contact +61 8 9216 1000	5 Email address of contact m.foy@pdigold.com
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 4 Charles Street		7 City, town, or post office, state, and ZIP code of contact South Perth WA 6151, Australia
8 Date of action April 15, 2026	9 Classification and description Ordinary Shares	

10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)
Q77174136		ASX: PDI; TSX: PDI	N/A

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 ▶ SEE ATTACHMENT.

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 ▶ SEE ATTACHMENT.

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 ATTACHMENT.

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.

Sign Here

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.

Signature ▶ Date ▶ 7/16/2026

Print your name ▶ Matthew Foy Title ▶

Paid Preparer Use Only

Print/Type preparer's name	Preparer's signature	Date	Check ☐ if self-employed	PTIN
Kendall R. Fisher		7/13/2026		P01980923
Firm's name ▶ Dorsey & Whitney LLP			Firm's EIN ▶	41-0223337
Firm's address ▶ Columbia Center, 701 Fifth Avenue, Suite 6100, Seattle, WA 98104			Phone no.	(206) 903-8793

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054

Predictive Discovery Limited

Attachment to Form 8937 – Part II

Report of Organizational Actions Affecting Basis of Securities (the Arrangement)

Consult your own tax advisor: The information contained herein is being provided pursuant to the requirements of Section 6045B of the Internal Revenue Code of 1986, as amended (the "**Code**"), and includes a general summary regarding the application of certain U.S. federal income tax laws and regulations relating to the effects of the Arrangement (as defined below) on the tax basis of shares of Predictive Discovery Limited, a corporation incorporated under the laws of Australia ("**PDI**"), in the hands of holders of shares of PDI stock who are U.S. taxpayers and who received such shares of PDI stock pursuant to the Arrangement by reason of previously being holders of shares of stock of Robex Resources Inc., a corporation incorporated under the laws of the Province of Québec, Canada ("**Robex**", and the U.S. taxpayers which received such shares, "**U.S. Shareholders**"). This discussion does not constitute tax advice and does not purport to be complete or to describe the consequences that may apply to particular categories of shareholders. Neither PDI nor Robex provides tax advice to its shareholders. You should consult your own tax advisors regarding the particular consequences of the Arrangement to you, including the applicability and effect of all U.S. federal, state and local tax laws as well as non-U.S. tax laws.

This Form 8937 and the analysis contained herein also does not address the U.S. federal, state, local or non-U.S. tax consequences of the Arrangement applicable to holders of options, DSUs, PSUs, warrants, or other convertible securities of Robex. Holders of such options, DSUs, PSUs, warrants, or other convertible securities of Robex should consult their own tax advisors regarding the tax consequences of the Arrangement to them in light of their own personal circumstances.

For additional information on the Arrangement, please read the Addendum to the Management Information Circular of Robex dated as of December 12, 2025 (the "**Circular**"), which is available at www.sedarplus.ca.

Part II Item 14. (Description of organizational action)

On April 15, 2026, pursuant to an arrangement agreement dated as of October 5, 2025, as amended on December 10, 2025 and April 7, 2026, by and among PDI, Robex and 9548-5991 Québec Inc., a corporation incorporated under the laws of the Province of Québec, Canada, and a wholly-owned subsidiary of PDI ("**Acquireco**"), Acquireco acquired all of the issued and outstanding shares of Robex (the "**Robex Shares**"), after which Robex became a wholly-owned subsidiary of Acquireco (the "**Arrangement**"). Pursuant to the Arrangement, each shareholder of Robex received 7.862 common shares of PDI (the "**PDI Shares**") in exchange for each Robex Share exchanged therefor. No fractional PDI Shares were issued pursuant to the Arrangement, as each fractional PDI share was rounded down to the nearest whole number. No cash was received by any shareholder of Robex in lieu of a fractional PDI Share pursuant to the Arrangement.

U.S. Shareholders should review the Circular and consult with their own tax advisors regarding the tax consequences of the Arrangement to them in light of their own particular circumstances.

Part II Item 15. (Description of the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer)

PDI intends that the Arrangement qualify as a tax-deferred reorganization within the meaning of Code Section 368(a), but provides no assurances in this regard. While not entirely free from doubt, the continued right of holders of Robex DSUs to receive an elective cash payment from PDI in respect of such DSUs following the Arrangement may adversely affect the foregoing intended tax-deferred treatment. Provided the Arrangement qualifies as a tax-deferred reorganization under Code Section 368(a), each U.S. Shareholder should have a tax basis in the PDI Shares received pursuant to the Arrangement equal to such U.S. Shareholder's adjusted tax basis in his, her or its Robex Shares surrendered in exchange therefor pursuant to the Arrangement.

If a U.S. Shareholder held different blocks of Robex Shares (i.e., Robex Shares acquired at different times or at different prices) at the time of the Arrangement, such U.S. Shareholder should consult its own tax advisor with respect to the determination of the tax basis of particular PDI Shares received in the Arrangement.

Certain U.S. Shareholders that fail to file a timely gain recognition agreement with the Internal Revenue Service may recognize gain under Code Section 367.

If Robex was a "passive foreign investment company" (a "**PFIC**") within the meaning of Code Section 1297(a), for any tax year during which a U.S. Shareholder held its Robex Shares, certain special PFIC rules may apply to the Arrangement subject to certain proposed Treasury Regulations that, if finalized in their current form, would apply to transactions on or after April 1, 1992 and that have not been adopted in final form (or withdrawn). U.S. Shareholders should review the Circular and consult with their own tax advisors regarding the potential application of the PFIC rules including the potential application of the proposed Treasury Regulations.

Part II Item 16. (Description of the calculation of the change in basis)

In the event the Arrangement is taxable for U.S. federal income tax purposes, for purposes of calculating fair market value, the fair market value of a PDI Share on April 15, 2026 is estimated at U.S.$0.663, which was the closing price of a PDI Share on the ASX on April 15, 2026 (as converted to U.S. dollars using the daily exchange rate published by the Reserve Bank of Australia on April 15, 2026).

Each U.S. Shareholder should consult with his, her or its own tax advisors to determine whether they are required to recognize gain in connection with the Arrangement and what measure of fair market value is appropriate.

Part II Item 17. (List of applicable Code sections)

Provided the Arrangement qualifies as a tax-deferred exchange under Code Section 368(a), the U.S. federal income tax consequences for U.S. Shareholders should be determined under Code Sections 354, 358, 367, 368 and 1223.

In addition, if Robex was a PFIC at any time during the period that a U.S. Shareholder held Robex Shares, then Code Sections 1291-1297 would be applicable.

Part II Item 18. (Recognition of loss)

Provided the Arrangement qualifies as a tax-deferred reorganization within the meaning of Code Section 368(a), each U.S. Shareholder which received PDI Shares pursuant to the Arrangement should not recognize any loss.

Part II Item 19. (Other information)

The Arrangement was effective on April 15, 2026. For a U.S. Shareholder which participated in the Arrangement whose taxable year is a calendar year, the reportable tax year is 2026.