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 DISH DBS CORPORATION			2 Issuer's employer identification number (EIN) 84-1328967
3 Name of contact for additional information INVESTOR RELATIONS	4 Telephone No. of contact (303)706-4000		5 Email address of contact
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 9601 S MERIDIAN BLVD			7 City, town, or post office, state, and ZIP code of contact ENGLEWOOD CO 80112
8 Date of action 03/19/2026	9 Classification and description SENIOR SECURED AND UNSECURED NOTES		
10 CUSIP number SEE ATTACHED	11 Serial number(s)	12 Ticker symbol	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 ▶ SEE ATTACHED

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 ATTACHED

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 ATTACHED

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

18 Can any resulting loss be recognized? ▶

SEE ATTACHED

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

SEE ATTACHED

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 ▶ Milton C. von Minden III Date ▶ 7/27/26

Print your name ▶ MILTON C VON MINDEN III Title ▶ VICE PRESIDENT, TAX

Paid Preparer Use Only

Print/Type preparer's name	Preparer's signature	Date	Check ☐ if self-employed	PTIN
Firm's name ▶			Firm's EIN ▶	
Firm's address ▶			Phone no.	

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

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Debt Instrument	144A CUSIP
5.25% SSN due 2026	25470XBE4
5.75% SSN due 2028	25470XBF1
7.75% SN due 2026	25470XAY1
7.375% SN due 2028	25470XBB0
5.125% SN due 2029	25470XBD6

SN = SECURED NOTES
SSN= SENIOR SECURED NOTES

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 March 19, 2026, EchoStar Corporation, DISH Network Corporation, DISH DBS Corporation ("DDBS") and certain of DDBS's subsidiaries (DDBS and its subsidiaries, collectively, the "Company") entered into a Restructuring Support Agreement (the "RSA") with an ad hoc group representing more than 82% of holders of debt securities issued by DDBS (the "DDBS Notes"). The RSA is attached to Form 8-K filed on March 19, 2026, available under SEC filings on www.sec.gov and the EchoStar investor relations page. https://ir.echostar.com/financial-information. For purposes of the discussion below, "Consenting Creditor" and "Claim Settlement Amount" has the meaning contained within the RSA.

The information contained within this form 8937 only applies to the Consenting Creditors.

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.

While not without doubt, it is the Company's position that the Claim Settlement Amount constituted a significant modification of the DDBS Notes as it relates to the Consenting Creditors. A significant modification results in a deemed exchange of old notes ("Old Notes") for new notes ("New Notes") for U.S. federal income tax purposes (the "Deemed Exchange").

Whether such a Deemed Exchange will be taxable to holder of the DDBS Notes that is also a Consenting Creditor and a US Taxpayer ("DDBS Noteholder") will depend on whether the Deemed Exchange qualifies as a recapitalization under 368(a)(1)(e) ("Recapitalization"), which, in turn, is dependent on whether both the Old Notes and the New Notes deemed received are considered "securities", in each case, for U.S. federal income tax purposes.

If the Deemed Exchange qualifies as a Recapitalization, in general, a DDBS Noteholder will not be permitted to recognize loss but will be required to recognize gain realized because of the Deemed Exchange of its Old Note for a New Note for United States federal income tax purposes. The aggregate basis of the deemed New Notes received should be equal to their respective basis in the Old Notes, decreased by the amount of any other property received, and increased by any amount of gain recognized. For purposes, of determining gain recognized as well as adjustment basis in the New Notes, the Consenting Creditors should consider the receipt of any cash received, or right to receive cash, related to the Claim Settlement Amount. Any such gain recognized will be equal to the lesser of (i) the amount of gain realized by the DDBS Noteholder as a result of the Deemed Exchange and (ii) the amount realized relating to the Claim Settlement Amount.

If the Deemed Exchange were not to qualify as a Recapitalization, a DDBS Noteholder generally would recognize any gain or (subject to the possible application of the wash sale rules) loss realized as a result of the Deemed Exchange, which, should take into consideration any cash received a any right to receive cash related to Claim Settlement Amount. In such case, the U.S. Consenting DDBS Noteholder's initial tax basis in the deemed New Note would be the issue price of the deemed New Note [Issue price is discussed further under 16 below]

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 above.

The issue price of a New Note will equal its fair market value on the date of the Deemed Exchange if the deemed New Note is considered to be "publicly traded" for United States federal income tax purposes. In general, an issue of debt instruments will be treated as publicly traded if, at any time during the thirty-one day period ending fifteen days after the issue date, there is a sales price or one or more firm or indicative quotes available for such debt instrument. If the deemed New Note is not considered to be publicly traded but the Old Note for which such New Note was deemed exchanged is considered to be publicly traded during the relevant period prior to the Deemed Exchange, then the issue price of the deemed New Note generally would be determined by reference to the fair market value of such Old Note. The fair market value of a debt instrument generally is determined by reference to the trading price or quoted price of the debt instrument (possibly reduced by the amount of a consent payment, if the consent payment is reflected in the trading price or quoted price). If neither the deemed New Note nor the Old Note is considered to be publicly traded, then the issue price of the deemed New Note generally would equal its stated principal amount. Although no assurances can be provided, the Company currently expects that the deemed New Notes and/or the Old Notes are likely to be considered "publicly traded" for these purposes. The rules regarding the determination of issue price are complex and highly detailed and each DDBS Noteholder should consult its tax advisor regarding the determination of the issue price of the deemed New Notes for United States federal income tax purposes. One approach for determining the issue price is to consider the trading price on March 19 after the RSA was executed and announced in Form 8-K. Below is a listing of trading price on March 19, 2026

Debt Instrument	Trading 3/19
5.25% SSN due 2026	99.00%
5.75% SSN due 2028	97.50%
7.75% SN due 2026	99.50%
7.375% SN due 2028	96.00%
5.125% SN due 2029	88.00%

SN = SECURED NOTES
SSN= SENIOR SECURED NOTES

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

354, 356, 358, 368(a)(1)(E), 1001

Item 18. Can any resulting loss be recognized?

Assuming the Deemed Exchange constituted Recapitalization, Consenting Creditors cannot recognize loss realized in the exchange.

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

The tax consequences of the Deemed Exchange should be reported by each applicable holder in its taxable year that includes March 19, 2025.

Assuming the Deemed Exchange constitutes a Recapitalization, the holding period for New Convertible Notes and New Notes received in the Deemed Exchange generally would include the holding period for the Old Notes exchanged.

The receipt of the Claim Settlement Amount by a DDBS Noteholder may be treated for U.S. federal income tax purposes either as (a) a payment on the Note, in which case such amount generally would be applied first against accrued but unpaid interest, if any, and then a return of the principal amount of the Note, or (b) separate consideration deemed paid for consenting to the Plan, in which case such amount would constitute ordinary income to the DDBS Noteholder. Although the issue is not free from doubt, the Company intends to take the position that the Claim Settlement Amount is payment on the Old Notes. No assurance can be given, however, that our position, if challenged by the IRS, would be sustained. DDBS Noteholders should consult their tax advisors regarding the proper U.S. federal income tax treatment of their receipt of the Claim Settlement Amount.

Consenting Creditors should consult their tax advisors to determine the tax consequences of the Deemed Exchange and the receipt of cash, or the right to cash, related to the Cash Settlement Amount for impact to them.