

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name Akastor ASA		2 Issuer's employer identification number (EIN) N/A See19	
3 Name of contact for additional information Brittany Lopez		4 Telephone No. of contact 713-270-2358	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 3010 Briarpark Drive Ste 500		5 Email address of contact brittany.lopez@akersolutions.com	
8 Date of action 9/26/2014		7 City, town, or post office, state, and Zip code of contact Houston, TX 77042-3755	
9 Classification and description Stock - Oslo Stock Exchange			
10 CUSIP number N/A See19	11 Serial number(s) N/A See19	12 Ticker symbol N/A See19	13 Account number(s) N/A See19

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 September 26, 2014, Aker Solutions ASA (renamed as Akastor ASA) underwent a demerger under Norwegian law. Pursuant to the demerger, certain assets of Aker Solutions ASA were transferred to a newly formed corporation, Aker Solutions Holding ASA. On September 29, 2014, the shares of Aker Solutions Holding ASA were distributed to the shareholders of Aker Solutions ASA of record on September 29, 2014. Pursuant to the demerger, Aker Solutions ASA was renamed as Akastor ASA, and Aker Solutions Holding ASA was renamed as Aker Solutions ASA. Aker Solutions ASA (renamed as Akastor ASA) is a Norwegian corporation and is hereafter referred to as the "Distributing Corporation". Aker Solutions Holding ASA (renamed as Aker Solutions ASA) is a Norwegian corporation and is hereafter referred to as the "Controlled Corporation".**

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 ▶ **Each U.S. person owning stock of the Distributing Corporation should allocate 28.19 percent of its tax basis in the stock of the Distributing Corporation on the date of the demerger to the shares of the Distributing Corporation and should allocate 71.81 percent of its tax basis in the stock of the Distributing Corporation on the date of the demerger to the shares of the Controlled Corporation received pursuant to the demerger.**

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 ▶ **The allocation of basis described above between shares of the Distributing Corporation and the Controlled Corporation is based on the average of the market high price and market low price of the shares of the Distributing Corporation and the Controlled Corporation on the Oslo Stock Exchange on September 29, 2014. Such average in the case of the Distributing Corporation was NOK 25.4452 and in the case of the Controlled Corporation was NOK 64.8304.**

Part II Organizational Action (continued)

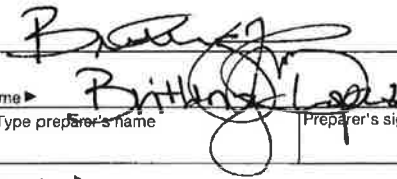
17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ **Section 355 provides for the nonrecognition of gain or loss to shareholders in the case of a spin-off. Basis in the stock of the Distributing Corporation is allocated between the stock of the Distributing Corporation and the Controlled Corporation in accordance with Section 358 and Treasury Regulation Section 1.358-2(a)(2)(iv).**

18 Can any resulting loss be recognized? ▶ **No loss is recognized by the shareholders in the demerger.**

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ **The relevant tax year is 2014. Only a small minority of the shareholders affected by the demerger are U.S. persons. The Distributing Corporation believes that the demerger is a spin-off qualifying under section 355 and is in the process of completing its analysis of this qualification. The Distributing Corporation will file a corrected Form 8937 to the extent required as a result of the completion of such analysis. The Distributing Corporation is traded on the Oslo Stock Exchange under the ticker symbol AKA. The Distributing Corporation has no U.S. employer identification number as it is a Norwegian corporation which is not a controlled foreign corporation and which is not a U.S. taxpayer as it is not engaged in any U.S. trade or business.**

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 ▶  Date ▶ 11/10/14

Print your name ▶ Brittny Lopez Title ▶

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.	