

## Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

### Part I Reporting Issuer

<b>1</b> Issuer's name		<b>2</b> Issuer's employer identification number (EIN)	
Atlas Copco AB (publ)		N/A	
<b>3</b> Name of contact for additional information	<b>4</b> Telephone No. of contact	<b>5</b> Email address of contact	
Daniel Althoff	+46 8 743 80 00	ir@se.atlascopco.com	
<b>6</b> Number and street (or P.O. box if mail is not delivered to street address) of contact		<b>7</b> City, town, or post office, state, and ZIP code of contact	
Sickla Industriväg 19		SE-105 23 Stockholm	
<b>8</b> Date of action		<b>9</b> Classification and description	
June 18, 2018		Distribution of the shares of Epiroc AB	
<b>10</b> CUSIP number	<b>11</b> Serial number(s)	<b>12</b> Ticker symbol	<b>13</b> Account number(s)
	SE0006886750/SE0006886768	ATCO A and ATCO B	

### 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 ▶

At the Annual General Meeting of Atlas Copco AB on April 24, 2018 the shareholders approved the proposal to distribute all the shares in its wholly owned subsidiary, Epiroc AB, on a one-for-one class-by-class basis, to Atlas Copco AB's shareholders. Atlas Copco completed the distribution on June 18, 2018; one share in Atlas Copco AB entitled a shareholder to one share in Epiroc AB of the same class. Atlas Copco series A shareholders received one series A share in Epiroc AB for each series A share held; and Atlas Copco series B shareholders received one series B share in Epiroc AB for each series B share held. The shares of series A in Atlas Copco AB and series B in Atlas Copco AB are listed at Nasdaq Stockholm Stock Exchange in Sweden. Atlas Copco shares are traded on the Nasdaq Stockholm Stock Exchange under the tickers ATCO A (A-shares) and ATCO B (B-shares).

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**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 ▶ A holder's basis in each Atlas Copco AB share held prior to the distribution, should be allocated between that Atlas Copco AB share and the Epiroc AB share received in respect thereof in proportion to their relative fair market values. U.S. federal income tax law does not prescribe how holders should determine the fair market value of a share on the date of the distribution and there are several possible methods for doing so (e.g., market opening, closing or volume weighted average trading prices on the date of the distribution). For Swedish tax purposes, the relative fair market values of the Atlas Copco AB shares and Epiroc AB shares are based on the lowest daily trading prices on NASDAQ Stockholm on June 12, 2018 and June 13, 2018. The price of both the Atlas Copco AB series A and series B shares each fell by approximately 25% between June 12, 2018 and June 13, 2018. Under this calculation, a holder would allocate approximately 75% of its basis in an Atlas Copco AB share held prior to the distribution to that Atlas Copco AB share and approximately 25% to the Epiroc AB Share recieved in respect thereof. The approach described above is illustrative and holders of Atlas Copco AB and Epiroc shares is not obligated to follow this approach. Holders are urged to consult their tax advisors regarding whether a different approach should be used.

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**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 ▶ Please also see addendum containing an illustrative numerical example.

On the last day of trading with the right to receive shares in Epiroc AB (June 12, 2018), the lowest price paid for Atlas Copco AB series A shares was SEK 361.25. On the first day of trading without the right to receive shares in Epiroc AB (June 13, 2018) the lowest price paid for Atlas Copco AB series A shares was SEK 271.10. The Atlas Copco AB series A share price fell by 25% calculated as (361.25-271.10)/361.25.

On the last day of trading with the right to receive shares in Epiroc AB (June 12, 2018) the lowest price paid for Atlas Copco AB series B shares was SEK 325.20. On the first day of trading without the right to receive shares in Epiroc AB (June 13, 2018) the lowest price paid for Atlas Copco AB series B shares was SEK 244.50. The Atlas Copco AB series B share price fell by 25% calculated as (325.20-244.50)/325.20.

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ Sections 355(a) and 358(c) of the Internal Revenue Code of 1986, amended and related Treasury Regulations.

18 Can any resulting loss be recognized? ▶ Atlas Copco AB shareholders should not recognize any gain or loss as a result of the distribution of the shares of Epiroc AB.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ For a holder whose taxable year is the calendar year, the reportable year is 2018.

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 ▶ [Handwritten Signature] Date ▶ July 30, 2018  
Print your name ▶ Fredrik Larsson Title ▶ Head of Group 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.	

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

## Form 8937, Part II

### Addendum to Question 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.**

Based on the values described in response to Question 15 and Question 16, the following is an illustrative example of the manner in which a holder may allocate its basis in an Atlas Copco AB series A share and Atlas Copco AB series B share, as applicable to an Epiroc AB share received in respect thereof pursuant to Atlas Copco AB's distribution of the shares of Epiroc AB.

Assumed tax basis in one Atlas Copco series A share prior to the distribution:	U.S. \$40.00
Percentage of total fair market value allocated to Atlas Copco AB series A share:	~75%
Percentage of total fair market value allocated to Epiroc AB series A share:	~25%
Basis allocated to Atlas Copco AB series A share after the distribution:	~U.S. \$30.00
Basis allocated to Epiroc AB series A share after the distribution:	~U.S. \$10.00

Assumed tax basis in one Atlas Copco series B share prior to the distribution:	U.S. \$40.00
Percentage of total fair market value allocated to Atlas Copco AB series B share:	~75%
Percentage of total fair market value allocated to Epiroc AB series B share:	~25%
Basis allocated to Atlas Copco AB series B share after the distribution:	~U.S. \$30.00
Basis allocated to Epiroc AB series B share after the distribution:	~U.S. \$10.00