Part I Reporting Issuer

1 Issuer's name

IHS Markit Ltd. (by acquiring entity S&P Global, Inc.)

2 Issuer's employer identification number (EIN)

98-1166311

3 Name of contact for additional information

Grant Nicholson

4 Telephone No. of contact

(866) 436-8502, Ext. 3

5 Email address of contact

Grant.Nicholson@ihsmarkit.com

6 Number and street (or P.O. box if mail is not delivered to street address) of contact

15 Inverness Way East

7 City, town, or post office, state, and ZIP code of contact

Englewood, CO 80112

8 Date of action

February 28, 2022

9 Classification and description

IHS Markit Ltd. common stock - Merger

10 CUSIP number

G47567105

11 Serial number(s)

INFO

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 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

16 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

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 ▶ 3/10/2022

Print your name ▶ Grant Nicholson
Title ▶ SVP Measure 4340 Tax

Paid Preparer Use Only
Print/Type preparer’s name
Preparer’s signature
Date
Check □ if self-employed
Firm’s EIN ▶
Phone no.

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84401-0054
ATTACHMENT TO IRS FORM 8937 – PART II
REPORT OF ORGANIZATIONAL ACTIONS AFFECTING BASIS OF SECURITIES

CONSULT YOUR 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”). This attachment includes a general summary regarding the application of certain U.S. federal income tax laws and regulations relating to the effects of the Merger (as defined below) on the tax basis of shares of common stock of S&P Global, Inc. (“S&P Global”) received in the Merger in exchange for shares of common stock of IHS Markit, Ltd. (“IHS Markit”). The information contained herein does not constitute tax advice and does not purport to be complete or to describe the consequences that may apply to particular categories of stockholders. Neither S&P Global nor IHS Markit provides tax advice to its stockholders. The information provided below is illustrative and is being provided pursuant to Section 6045B of the Code and as a convenience to stockholders and their tax advisers when establishing their specific tax positions. You are urged to consult your own tax advisors regarding the particular consequences of the Merger to you, including the applicability and effect of all U.S. federal, state and local tax laws and foreign tax laws. Please read the joint proxy statement/prospectus, dated January 20, 2021, that was filed with the Securities and Exchange Commission (the “SEC”), noting especially the discussion therein under the heading “Material U.S. Federal Income Tax Consequences of the Merger.” You may access the joint proxy statement/prospectus at www.sec.gov.

Line 14. Describe the organizational action and, if applicable, the date of the action or the date against which the shareholders’ ownership is measured from the action.

On February 28, 2022, pursuant to the terms and conditions of the Agreement and Plan of Merger, dated November 29, 2020 (as amended as of January 20, 2021), by and among S&P Global, Sapphire Subsidiary, Ltd., a wholly-owned subsidiary of S&P Global (“Merger Sub”) and IHS Markit, Merger Sub merged with and into IHS Markit, with IHS Markit continuing as the surviving company and a wholly-owned subsidiary of S&P Global (the “Merger”).

Each share of IHS Markit common stock issued and outstanding immediately prior to the effective time of the Merger (other than (x) shares owned or held in treasury by IHS Markit, immediately prior to the effective time, which ceased to exist with no consideration delivered in exchange therefor, and (y) shares owned by holders who did not vote in favor of the Merger and who complied with all of the provisions of the Bermuda Companies Act concerning the right of holders of shares of IHS Markit common stock to require appraisal of their shares of IHS Markit common stock pursuant to Section 106(6) of the Bermuda Companies Act) was converted into the right to receive 0.2838 shares of S&P Global common stock and ceased to exist. No fractional shares of S&P Global common stock were issued in the Merger. Instead, IHS Markit
stockholders received cash in lieu of fractional shares of S&P Global common stock. The Merger is intended to qualify as a “reorganization” within the meaning of Section 368(a) of the Code.

**Line 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.**

Assuming the Merger qualifies as a “reorganization” within the meaning of Section 368(a) of the Code, IHS Markit stockholders who exchange their shares of IHS Markit common stock for shares of S&P Global common stock generally will not recognize any gain or loss for U.S. federal income tax purposes, except with respect to cash, if any, received in lieu of fractional shares of S&P Global common stock.

Each IHS Markit stockholder’s aggregate tax basis in the shares of S&P Global common stock received in the Merger (including any fractional share of S&P Global common stock for which cash was received) will equal such IHS Markit stockholder’s aggregate adjusted tax basis in the shares of IHS Markit common stock exchanged therefor. If an IHS Markit stockholder held different blocks of IHS Markit common stock (i.e., shares acquired at different times or different prices) at the time of the Merger, such stockholder should consult its own tax advisor with respect to the determination of any gain and the tax bases of particular shares of S&P Global common stock received in the Merger.

An IHS Markit stockholder who receives cash in lieu of a fractional share of S&P Global common stock generally will recognize capital gain or loss equal to the difference between the amount of cash received and the tax basis in such fractional share, determined as described above.

**Line 16. Describe the calculation of the change in basis and the data that supports the calculation, such as the market value of securities and the valuation date.**

The aggregate tax basis of the S&P Global common stock received in the Merger (including any fractional share interests in S&P Global common stock deemed received) will equal the aggregate adjusted tax basis in the shares of IHS Markit common stock exchanged.

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

Section 354, Section 358, Section 368(a), Section 1001 and Section 1223.

**Line 18. Can any resulting loss be recognized?**

IHS Markit stockholders generally may not recognize any loss for U.S. federal income tax purposes as a result of the Mergers, except with respect to cash, if any, received in lieu of fractional shares of S&P Global common stock.
Line 19. Provide any other information necessary to implement the adjustment, such as the reportable tax year.

The Merger was effective on February 28, 2022. For an IHS Markit stockholder whose taxable year is the calendar year, the reportable tax year is 2022.