

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 Statement I](#)

Blank lines for listing Internal Revenue Code sections.

18 Can any resulting loss be recognized? ▶ [See Statement I](#)


Blank lines for providing information on loss recognition.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ [See Statement I](#)

Blank lines for providing other necessary information.

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 ▶ Robert Cartwright Date ▶ 06/04/26
Print your name ▶ Robert Cartwright Title ▶ CFO

Paid Preparer Use Only	Print/Type preparer's name PAYAL GUPTA	Preparer's signature 	Date 6/4/2026	Check <input type="checkbox"/> if self-employed	PTIN P01602408
	Firm's name ▶ ARMANINO ADVISORY LLC	Firm's EIN ▶			
	Firm's address ▶ 50 W SAN FERNANDO ST, #500 SAN JOSE, CA 95113-2433	Phone no ▶ 408-200-6400			

SnapMedTech, Inc.
Form 8937 – Statement I
Attachment to Form 8937
Report of Organizational Action Affecting Basis of Securities

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The information contained in Form 8937 and this attachment does not constitute tax advice and does not purport to take into account any holder’s specific circumstances. This attachment is intended to provide only a general summary of certain U.S. federal income tax consequences of the transaction described herein. Holders are urged to consult their own tax advisors.

Part II – Organizational Action

Question 14

On April 20, 2026, pursuant to an Agreement and Plan of Contribution and Merger (the “Agreement”), the shareholders of SnapMedTech, Inc. (“Snap” or the “Company”) contributed all of their equity interests in Snap to MedStaff Technologies, Inc. (“Parent”) in exchange for shares of Parent voting common stock (the “Transaction”).

Following the Transaction:

- Snap became a wholly owned subsidiary of Parent; and
- The former shareholders of Snap received shares of Parent voting common stock in exchange for their Snap equity

Question 15

The information contained herein does not purport to be complete or to describe the consequences that may apply to particular categories of shareholders.

For purposes of this discussion, a “U.S. holder” is a beneficial owner of Snap equity that is, for U.S. federal income tax purposes, a citizen or resident of the United States or otherwise subject to U.S. federal income taxation on a net income basis.

In connection with the Transaction:

- Exchanging shareholders of Snap received an aggregate number of shares of Parent voting common stock in exchange for their Snap equity.

Prior to the Transaction, Snap had multiple classes of equity outstanding, including common stock and various series of preferred stock. Each holder received Parent voting common stock in exchange for such holder's Snap equity, with allocations determined based on the transaction terms and relative ownership interests immediately prior to the Transaction.

The Transaction is expected to qualify and will be reported as a reorganization within the meaning of Section 368(a)(1)(B) of the Internal Revenue Code of 1986, as amended (the "Code").

The U.S. federal income tax consequences to U.S. holders of Snap equity are as follows:

- A U.S. holder is not expected recognize gain or loss upon the exchange of Snap equity for Parent voting common stock;
- The aggregate tax basis of the Parent voting common stock received is expected to be equal to the aggregate tax basis of the Snap equity surrendered in exchange therefor; and
- The holding period of the Parent voting common stock received is expected to include the holding period of the Snap equity surrendered.

If a holder held multiple blocks of Snap equity with differing tax bases, such holder's tax basis and holding period in the Parent voting common stock received will be determined separately with respect to each such block.

Question 16

As described above, the Transaction is expected to qualify as a reorganization within the meaning of Section 368(a)(1)(B) of the Code. Accordingly, the aggregate tax basis of the Parent voting common stock received in the Transaction will be equal to the aggregate tax basis of the Snap equity surrendered.

Holders should consult their own tax advisors to determine the specific tax consequences and basis adjustments applicable to their circumstances.

Question 17

Sections 368(a)(1)(B), 354(a), 358(a), 362, and 1223 of the Code.

Question 18

No gain or loss is expected to be recognized by a U.S. holder upon the exchange of Snap equity for Parent voting common stock.

Question 19

The reportable taxable year is 2026.






Form 8937 - SnapMedTech - 2026 Transaction (06.04.2026)v.SENT

Final Audit Report

2026-06-04

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