

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ Sections 354, 358 and 368 of the Code.

Horizontal lines for listing applicable Internal Revenue Code sections.

18 Can any resulting loss be recognized? ▶ See attachment.

Horizontal lines for providing information on resulting loss recognition.

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

Horizontal lines for providing other information necessary for the adjustment.

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
DocuSigned by:
Signature ▶ Emily Pimblett Date ▶ 8/1/24
Print your name ▶ Emily Pimblett Title ▶ Chief Accounting Officer

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.

Tenet Medicines, Inc.
EIN: 93-4332617
Attachment to Form 8937

Tenet Medicines, Inc.
EIN: 93-4332617
Attachment to Form 8937

Form 8937, Part I, Box 9:
Tenet Medicines, Inc. common stock

Form 8937, Part II, Box 14:

On June 27, 2024, pursuant to the Agreement and Plan of Merger and Reorganization, dated as of April 10, 2024, by and among Eliem Therapeutics, Inc. ("Eliem"), Tenet Medicines, Inc. ("Tenet"), Tango Merger Sub, Inc. ("Merger Sub"), a wholly owned subsidiary of Eliem, and, solely in his capacity as Company Equityholder Representative, Stephen Thomas (such agreement, the "Merger Agreement"), Merger Sub merged with and into Tenet, with Tenet surviving (the "Merger" and the effective time of the Merger, the "Effective Time").

At the Effective Time, each share of Tenet's common stock, par value \$0.0001 per share (the "Tenet Stock"), converted into the right to receive 0.122755 shares of Eliem common stock, par value \$0.0001 per share ("Eliem Common Stock"). Tenet SAFEs were also converted into Eliem Common Stock in the Merger. To the extent that the Tenet SAFEs were properly treated as stock for U.S. federal income tax purposes prior to the Merger, the tax consequences of the conversion of the Tenet Stock in the Merger described below will also apply to the conversion of the Tenet SAFEs. The aggregate number of shares of Eliem Common Stock issuable to a holder of Tenet Stock or Tenet SAFEs in the Merger was rounded to the nearest whole share (and, if such holder was otherwise entitled to receive 0.5 shares of Eliem Common Stock, was rounded up to the nearest whole share). No fractional shares of Eliem Common Stock were issued in the Merger.

The Merger is intended to qualify as a reorganization under Section 368(a) of the Internal Revenue Code of 1986, as amended (the "Code").

Form 8937, Part II, Box 15:

The following description assumes that the Merger constitutes a reorganization under Section 368 of the Code.

As a result of the Merger, a holder of Tenet Stock who received shares of Eliem Common Stock in the Merger generally will have an aggregate tax basis in the Eliem Common Stock such holder received in the Merger equal to the holder's aggregate adjusted tax basis in the Tenet Stock exchanged therefor. If a shareholder acquired different blocks of Tenet Stock at different prices, the tax basis of each block of Eliem Common Stock received by such holder in the Merger will be determined on a block-by-block basis depending upon the tax basis of the blocks of Tenet Stock exchanged therefor.

Form 8937, Part II, Box 16:

See response to Box 15, above.

Tenet Medicines, Inc.
EIN: 93-4332617
Attachment to Form 8937

Form 8937, Part II, Box 18:

A shareholder who received shares of Eliem Common Stock in the Merger may not recognize a loss.

Form 8937, Part II, Box 19:

The Merger was consummated on June 27, 2024. Consequently, the reportable year for holders of Tenet Stock for reporting the tax effect of the Merger is the taxable year that includes June 27, 2024 (e.g. 2024 for calendar-year taxpayers).