

**Leonardo DRS, Inc. (“DRS”)  
EIN 13-2632319  
Attachment to Form 8937  
Date of Organizational Action: November 28, 2022**

**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 shareholders. Each shareholder is advised to consult his or her tax advisor regarding the tax treatment of the merger. Further discussion of the tax consequences of the merger can be found in Amendment No. 2 to DRS’s Registration Statement on Form S-4 filed with the Securities and Exchange Commission on September 9, 2022, under the heading “Material U.S. Federal Income Tax Consequences” (available at <https://www.sec.gov/ix?doc=/Archives/edgar/data/0001833756/000162828022024689/drs-20220909.htm>) (the “Form S-4”).**

**Form 8937 Part I, Box 10:**

The CUSIP number for DRS common stock is: 52661A108.

The CUSIP number for RADA Electronic Industries LTD. common stock is: M81863124.

**Form 8937 Part II, Box 14:**

On November 28, 2022, pursuant to the Agreement and Plan of Merger, dated as of June 21, 2022 (the “Merger Agreement”), by and among Leonardo DRS, Inc., a Delaware corporation (“DRS”), RADA Electronic Industries Ltd., a company organized under the laws of the State of Israel (“RADA”) and Blackstart Ltd, a company organized under the laws of the State of Israel and a wholly owned subsidiary of DRS (“Merger Sub”), Merger Sub merged with and into RADA, with RADA surviving the merger as a wholly owned subsidiary of DRS (the “Merger”).

At the closing of the Merger, the outstanding ordinary shares of RADA, par value NIS 0.03 per share (“**RADA Shares**”), were converted into the right to receive one share of DRS common stock, par value \$0.01 per share (“**DRS Shares**”).

**Form 8937 Part II, Box 15:**

Consistent with the Form S-4, the company merger will be reported as, and DRS believes that the company merger qualified as, a “reorganization” within the meaning of Section 368(a) of the Internal Revenue Code of 1986, as amended (the “Code”). DRS and RADA have not requested and do not intend to request any ruling from the Internal Revenue Service as to the U.S. federal income tax consequences of the Merger.

Assuming the Merger constitutes a reorganization, with respect to holders of RADA Shares that are U.S. taxpayers not in a special class of holders subject to special rules as described further in the Form S-4 (“U.S. holders”):

- U.S. holders of RADA Shares will not recognize income, gain or loss upon the receipt of DRS Shares in the Merger;
- the aggregate tax basis of DRS Shares received by a U.S. holder of RADA Shares in the Merger will be the same as the aggregate tax basis of the RADA Shares for which they are exchanged; and
- the holding period (for U.S. federal income tax purposes) of DRS Shares received in exchange for shares of RADA Shares will include the holding period of the RADA Shares for which they are exchanged.

**Form 8937 Part II, Box 16:**

See response to Box 15, above.

**Form 8937 Part II, Box 17:**

DRS believes that the Merger qualifies as a “reorganization” within the meaning of Section 368(a) of the Code for U.S. federal income tax purposes. Consequently, the U.S. federal income tax consequences of the Merger to the U.S. holders of RADA Shares are determined under Sections 354, 358 and 368 of the Code.

**Form 8937 Part II, Box 18:**

DRS believes that the Company merger qualifies as a “reorganization” within the meaning of Section 368(a) of the Code for U.S. federal income tax purposes. As described in the response to box 15, assuming that the Merger is so treated, a U.S. holder of RADA Shares will not recognize any loss upon receipt of DRS Shares in the Merger.

**Form 8937 Part II, Box 19:**

The Merger was consummated on November 28, 2022. Consequently, the reportable taxable year of the U.S. holders of RADA Shares for reporting the tax effect of the Merger is the taxable year that includes November 28, 2022.