

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name ABB Ltd		2 Issuer's employer identification number (EIN)	
3 Name of contact for additional information ABB Investor Center	4 Telephone No. of contact +41 43 317 71 11	5 Email address of contact investor.relations@ch.abb.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact Affolternstrasse 44		7 City, town, or post office, state, and ZIP code of contact Zurich, CH-8050	
8 Date of action 3 October 2022	9 Classification and description stock		
10 CUSIP number 000375204	11 Serial number(s) US0003752047, CH0012221716	12 Ticker symbol NYSE: ABB	13 Account number(s) n/a

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 ▶

Ref to the Attachment "Form 8937 Part II"

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 ▶

Ref to the Attachment "Form 8937 Part II"

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 ▶

Ref to the Attachment "Form 8937 Part II"

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶
Ref to the Attachment "Form 8937 Part II"

Multiple horizontal lines for listing applicable Internal Revenue Code sections and subsections.

18 Can any resulting loss be recognized? ▶
Ref to the Attachment "Form 8937 Part II"

Multiple horizontal lines for indicating if a resulting loss can be recognized and providing a reference to an attachment.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶
Ref to the Attachment "Form 8937 Part II"

Multiple horizontal lines for providing other information necessary to implement 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

Signature ▶ *Christian Hediger* *A. Anliker* Date ▶ 14-Oct-2022

Print your name ▶ Christian Hediger Alexander Anliker Title ▶ Authorized Signatories

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.

Attachment

Form 8937

Part II – Organizational Action

Line 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.

On October 3, 2022 (the “Distribution Date”), ABB Ltd (“ABB”) distributed 100% of the outstanding shares of common stock of Accelleron Industries Ltd (“Accelleron”) pro rata to ABB shareholders of record as of the close of business on September 30, 2022 (the “Record Date,” and such distribution, the “Distribution”). In the Distribution, each shareholder who held ABB common stock on the Record Date received 1 share of Accelleron common stock for every 20 shares of ABB common stock owned on the Record Date.

ABB maintains a sponsored American Depositary Receipts (“ADR”) program, and American Depositary Shares (“ADSs”) issued under that program trade on the New York Stock Exchange under the symbol “ABB”. In connection with the Distribution, ADSs of Accelleron were issued to US taxpayers through an unsponsored ADR program. For purposes of this form, references to ABB and Accelleron stock shall include ABB and Accelleron ADSs, and references to ABB and Accelleron shareholders shall include holders of ABB and Accelleron ADSs, respectively.

No fractional shares of Accelleron common stock were issued. All fractional shares of Accelleron common stock that ABB shareholders otherwise would have been entitled to receive as a result of the Distribution were aggregated into whole shares and sold on the open market, and the resulting cash proceeds of the sale were paid to such shareholders.

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.

As a result of the Distribution, an ABB shareholder will be required to allocate its aggregate tax basis in its ABB common stock held immediately before the Distribution among the shares of Accelleron common stock received in the Distribution including fractional shares of Accelleron stock in lieu of which cash was received by reason of the ABB shareholder holding a number of ABB shares not divisible by 20 and the ABB common stock in respect of which such Accelleron common stock was received. This allocation must be in proportion to the relative fair market values of the ABB common stock and the Accelleron common stock.

Line 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.

The US federal income tax laws provide that the allocation of the aggregate tax basis discussed under Line 15 above shall be allocated in the Distribution based on the fair market value of the resulting ABB and Accelleron shares received. However, the tax law does not provide any further guidance on the determination of fair market value. There are various methods that may be appropriate for determining the fair market value of each of the ABB and Accelleron shares. One potential method for determining the value of the shares is to use the closing price of the stock on the day after the spin-off.

The following is an *example* of how the tax basis allocation would be applied using illustrative market prices for the day after the Distribution:

Stock of ABB owned	100 shares
Aggregate tax basis in ABB stock (\$25 per share)	\$2,500
Stock of Accelleron received in the Distribution	5 shares

	# of Shares Owned	Illustrative Market Closing Price (Day after Distribution)	Illustrative Fair Market Value (FMV) (Day after Distribution)	FMV Percentage	Allocated Tax Basis	Tax Basis Per Share
ABB stock	100.0000	\$ 29.00	\$ 2,900.00	96.67%	\$ 2,416.67	\$ 24.17
Accelleron stock	5.0000	\$ 20.00	\$ 100.00	3.33%	\$ 83.33	\$ 16.67
Totals			\$ 3,000.00	100.00%	\$ 2,500.00	

Shareholders are urged to consult their tax advisors regarding these basis allocation calculations.

A US holder that has acquired different blocks of shares of ABB stock at different times or at different prices should consult a tax advisor regarding the allocation of the aggregate basis in the shares of Accelleron stock distributed with respect to such blocks of ABB stock.

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

Section 355; Section 358; Section 1001.

Line 18 – Can any resulting loss be recognized? Generally, no gain or loss will be recognized for tax purposes as a result of the Distribution.

An ABB shareholder who receives cash in lieu of a fractional share of Accelleron common stock will recognize gain or loss equal to the difference between the amount of cash received and the tax basis in the fractional share. The deductibility of capital losses may be subject to limitations.

Line 19 – Provide any other information necessary to implement the adjustment, such as the reportable tax year.

The Distribution occurred on October 3, 2022. As a result, the basis adjustments in the shares of ABB common stock and Accelleron common stock should be reported in the taxable year that includes this date. In the case of shareholders who are calendar year taxpayers, the Distribution is reportable in the tax year ending December 31, 2022.