

Part II Organizational Action (continued)

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

Please see attached.

Multiple horizontal lines for listing applicable Internal Revenue Code sections.

18 Can any resulting loss be recognized? ▶ Please see attached.

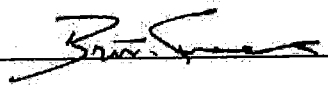
Multiple horizontal lines for providing information regarding resulting loss recognition.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ Please see attached.

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 ▶ 

Date ▶ 1/13/2020

Print your name ▶ Brett A Cornell

Title ▶ Senior VP Tax

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 ▶		Phone no.	
Firm's address ▶				

Danaher Corporation
EIN: 59-1995548

Attachment to Form 8937 – Report of Organizational Actions Affecting Basis of Securities
Part II – Organizational Action

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 November 15, 2019, Danaher Corporation ("Danaher") commenced an exchange offer ("Split-off", the "Exchange Offer"), which expired on December 13, 2019, related to its remaining interest in Envista Holdings Corporation ("Envista"). Envista completed its initial public offering (IPO) in September 2019, with Danaher retaining an 80.6 percent ownership interest in Envista. In the Exchange Offer, Danaher stockholders have the option to exchange all, some or none of their shares of Danaher common stock for shares of Envista common stock owned by Danaher, subject to the terms of the offer.

On December 13, 2019, the final exchange ratio was announced. Pursuant to the Exchange Offer, for each \$100 of Danaher Common Stock accepted in the Exchange Offer, Danaher shareholders will receive approximately \$107.53 of Envista Common Stock, subject to an upper limit of 5.5784 shares of Envista Common Stock per share of Danaher Common Stock. The Exchange Offer does not provide for a lower limit or minimum exchange ratio. Because the upper limit was in effect, the exchange ratio has been fixed at that limit, and Danaher stockholders will receive 5.5784 shares of Envista Common Stock per share of Danaher Common Stock accepted in the Exchange Offer.

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.

Danaher shareholders participating in the Split-off surrendered their Danaher shares ("Redeemed Shares") received only Envista shares. The basis and holding period of the Redeemed Shares carried over to the Envista shares received. Therefore, 100% of the basis in the Redeemed Shares was allocated to the Envista shares received.

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

See response to 15 above, for 100% of the basis in the Redeemed Shares being allocated to the Envista shares received by the Danaher shareholders participating in the Split-off. In general, if more than one share of stock is received in exchange for one share of stock surrendered, the basis of the share surrendered is allocated among the shares received in proportion to the fair market value of the shares received. Because the shares issued by Envista stock to participating Danaher shareholders have uniform value, the allocation of basis in Danaher shares surrendered is allocated based on the number of Envista shares received.

In general, if surrendered shares of stock were purchased or acquired on different dates or at different prices and the shareholder is unable to identify which particular share (or allocable portion of a share) is received (or deemed received) in exchange for, or with respect to, a particular share surrendered, the shareholder may designate which share is received in exchange for, or with respect to, a particular share surrendered, provided such designation is consistent with the terms of the exchange or distribution and applicable rules. In the case of a designation with respect to the Split-off, the designation must be made on or before the first date on which the basis of either the remaining Danaher shares (if any) or applicable Envista shares is relevant.

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

The applicable Internal Revenue Code sections upon which the tax treatment is based are sections 355, 358 and 368.

18. Can any resulting loss be recognized?

The Split-off is treated as qualifying for non-reorganization treatment under sections 355 and 368(a)(1)(D) of the Internal Revenue Code. Assuming that this characterization is respected, Danaher shareholders generally will not recognize any loss for participating in the Split-off for U.S. federal income tax purposes (except to the extent that a loss may be recognized with respect to any cash received in lieu of fractional shares of Envista common stock).

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

The Split-off was completed in December 18, 2019. As a result, the basis adjustments in the shares of Danaher common stock and Envista common stock should be reported in the taxable year that includes this date. In the case of shareholders who are calendar year taxpayers, the transaction is reportable in the tax year ending December 31, 2019.