

SolarWinds Corporation

**Distribution of N-able, Inc. Common Stock
Attachment to Form 8937**

Part II

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 July 19, 2021, SolarWinds Corporation ("SolarWinds") distributed to holders of SolarWinds common stock, on a pro rata basis, 88.46% of the outstanding shares of N-able, Inc. ("N-able") common stock (except that any fractional shares of N-able common stock that SolarWinds shareholders otherwise would have been entitled to receive in the distribution were aggregated and sold in the public market and the aggregate net cash proceeds of these sales were distributed to those shareholders who would otherwise have been entitled to receive such fractional shares) (the "Distribution"). Each SolarWinds shareholder received one share of N-able common stock for every two shares of SolarWinds common stock held on July 12, 2021, the record date for the Distribution.

The information contained herein does not constitute tax advice and is not intended or written to be used for the purpose of avoiding penalties under the Internal Revenue Code. In addition, this information does not purport to be complete or to describe the consequences that may apply to particular categories of SolarWinds shareholders.

Shareholders are urged to consult their own tax advisor regarding the particular consequences of the Distribution, including the applicability and effect of all U.S. federal, state, local and foreign tax laws.

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.

The aggregate tax basis of a U.S. taxpayer's shares of SolarWinds common stock held prior to the Distribution must be allocated between (i) the SolarWinds common stock the U.S. taxpayer continued to hold immediately following the Distribution and (ii) the N-able common stock the U.S. taxpayer received in the Distribution (including any fractional share of N-able common stock the U.S. taxpayer is treated as having received), in proportion to their relative fair market values.

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.

U.S. federal income tax laws do not specifically identify how to determine the fair market values of the post-Distribution SolarWinds common stock or the N-able common stock. One method for determining the fair market values is to use the average of the high and low trading prices of the

SolarWinds common stock and N-able common stock quoted on the New York Stock Exchange on July 20, 2021, the first trading day after the Distribution.

Using this method, after the Distribution, the fair market value of a share of SolarWinds common stock was \$10.16 and the fair market value of a share of N-able common stock was \$14.05. Based on these relative fair market values and the distribution ratio of one share of N-able common stock per two shares of SolarWinds common stock, shareholders' pre-Distribution tax basis in their SolarWinds common stock would be apportioned approximately 59.1213% to their post-Distribution SolarWinds common stock and approximately 40.8787% to their N-able common stock.

Line 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.

Line 18 – Can any resulting loss be recognized?

SolarWinds intends for the Distribution to qualify as a “reorganization” under sections 355 and 368(a)(1)(D) of the Internal Revenue Code. Assuming that this characterization is respected, SolarWinds shareholders generally will not recognize any loss on the Distribution 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 N-able common stock).

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

The Distribution occurred on July 19, 2021. As a result, the basis adjustments in the shares of SolarWinds common stock and N-able 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, 2021.