

► See separate instructions.

<b>Part I</b>	<b>Reporting Issuer</b>
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1 Issuer's name

2 Issuer's employer identification number (EIN)

## Pentair plc

98-1141328

3 Name of contact for additional information

4 Telephone No. of contact

5 Email address of contact

See attached

See attached

See attached

6 Number and street (or P.O. box if mail is not delivered to street address) of contact

7 City, town, or post office, state, and ZIP code of contact

See attached

See attached

8 Date of action

## 9 Classification and description

See attached

See attached

10 CUSIP number

11 Serial number(s)

12 Ticker symbol

<b>13</b>	Account number(s)
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See attached

See attached

See attached

See attached

See attached	See attached	See attached	See attached
<b>Part II</b>	<b>Organizational Action</b> 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 ► [See attached](#)

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 ► [See attached](#)

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 ► [See attached](#)

**Part II** **Organizational Action** (continued)

**17** List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ► See attached

**18** Can any resulting loss be recognized? ► See attached

**19** Provide any other information necessary to implement the adjustment, such as the reportable tax year ► See attached

**Sign  
Here**

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.

Signature ► Mark Borin

Date ► 5/11/18

Print your name ► Mark Borin

Title ► Chief Financial 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.	

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054

**ATTACHMENT TO FORM 8937**  
**(“REPORT OF ORGANIZATIONAL ACTIONS AFFECTING BASIS OF SECURITIES”)**

**Pentair plc**

Part I, Items 1-2	Issuer Name and EIN	Pentair plc Employer Identification No. 98-1141328
Part I, Items 3-7	Contact information	Name of contact: Investor Relations Telephone No. of contact: (763) 545 1730 Email address of contact: InvestorRelations@pentair.com Address of contact: 43 London Wall London, EC2M 5TF United Kingdom
Part I, Item 8	Date of action	April 30, 2018
Part I, Items 9-12	Security information	Pentair plc ordinary shares CUSIP #: G7S00T 104 Ticker Symbol: PNR
Part II, Item 14	Description of organizational action	<p>At 4:59 p.m., Eastern Time, on April 30, 2018, a pro rata distribution of ordinary shares of nVent Electric plc (“<u>nVent</u>”) was made to holders of ordinary shares of Pentair plc (“<u>Pentair</u>”). In this distribution (the “<u>Distribution</u>”), one (1) nVent ordinary share was distributed with respect to every Pentair ordinary share outstanding as of the close of business on April 17, 2018, the record date; provided, however, that fractional nVent ordinary shares were not distributed, and any Pentair shareholder otherwise entitled to receive a fractional nVent ordinary share received cash in lieu of such fractional share.</p> <p>The nVent ordinary shares distributed in the Distribution have a CUSIP number of G6700G 107 and have a ticker symbol of NVT.</p>

Part II, Item 15	Description of the quantitative effect of the organizational action on the basis of the security in the hands of the U.S. taxpayer as an adjustment per share or as a percentage of old stock basis	<p>No gain or loss is recognized by a holder of Pentair ordinary shares solely as a result of the receipt of nVent ordinary shares.</p> <p>The aggregate tax basis of Pentair ordinary shares and nVent ordinary shares, including any fractional share deemed received, in the hands of a holder immediately after the Distribution is the same as the aggregate tax basis of Pentair ordinary shares held by the holder immediately before the Distribution, allocated between the Pentair ordinary shares and nVent ordinary shares, including any fractional share deemed received, in proportion to their relative fair market values on the date of the Distribution.</p> <p>The holding period of the nVent ordinary shares received by a holder in the Distribution includes the holding period of such holder's Pentair ordinary shares, provided that such Pentair ordinary shares were held as capital assets on the date of the Distribution.</p> <p>A holder who received cash in lieu of a fractional nVent ordinary share in the Distribution is treated as having sold such fractional share for the amount of cash it actually receives, and recognizes gain or loss in an amount equal to the difference between the amount of such cash received and such holder's adjusted tax basis in the fractional share. That gain or loss is treated as a capital gain or loss if the fractional share would have been held as a capital asset. Any such capital gain or loss is long-term capital gain or loss if the holder's holding period for its Pentair ordinary shares exceeds one year on the date of the Distribution.</p> <p>Shareholders that acquired Pentair ordinary shares at different times or different prices will need to calculate their tax basis in each block of Pentair ordinary shares. A person who held Pentair ordinary shares immediately before the Distribution is required to allocate the aggregate tax basis in each block of Pentair ordinary shares held immediately before the Distribution among (i) the nVent ordinary shares (including any fractional share deemed received) that were received with respect to that block of Pentair ordinary shares, and (ii) the Pentair ordinary shares in that block that were held by such person immediately after the Distribution. This allocation should be made in proportion to the relative fair market value, on the date of the Distribution, of the shares described in clause (i) of the immediately preceding sentence and the fair market value of the shares described in clause (ii) of the immediately preceding sentence.</p> <p>For additional information on the quantitative effect of the Distribution, please see the discussion below under "Tax Basis Information Notice For Pentair Shareholders Regarding Distribution of nVent Ordinary Shares."</p>
Part II, Item 16	Description of the calculation of the change in basis and the data that supports the calculation	Please see the discussion below under "Tax Basis Information Notice For Pentair Shareholders Regarding Distribution of nVent Ordinary Shares."

Part II, Items 17-18	List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based and ability of any resulting loss to be recognized.	Sections 355(a)(1), 358(a), 358(b), and 1001.  No loss may be recognized, except with respect to a fractional share deemed received and sold for cash as described in item 15.
Part II, Item 19	Provide any other information necessary to implement the adjustment	N/A



## Tax Basis Information Notice For Pentair Shareholders Regarding Distribution of nVent Ordinary Shares

### CONSULT YOUR TAX ADVISOR

The information contained in this Notice provides a general summary regarding the application of certain provisions of the U.S. Internal Revenue Code of 1986, as amended (the “Code”), and the Treasury regulations relating to the allocation of tax basis among the Pentair ordinary shares and nVent ordinary shares (including any fractional share deemed received) following the Distribution. The information contained in this Notice 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. Pentair does not provide tax advice to its shareholders. The example below is provided solely for illustrative purposes and as a convenience to shareholders and their tax advisors when establishing their specific tax position. You are urged to consult your own tax advisor regarding the particular consequences of the Distribution to you, including the applicability and effect of all U.S. federal, state, local and foreign tax laws. We urge you to read the information statement, dated April 9, 2018, of nVent, noting especially the discussion on pages 151-154 under the heading “*Material U.S. Federal Income Tax Consequences*”.

This Notice does not apply to any Pentair ordinary shares that you sold or otherwise disposed of prior to the time of the Distribution.

### GENERAL GUIDANCE REGARDING TAX BASIS IN A TAX-FREE SPIN-OFF

Shareholders that acquired blocks of Pentair ordinary shares at different times or different prices will need to calculate their tax basis in each block of Pentair ordinary shares. A person who held Pentair ordinary shares immediately before the Distribution is required to allocate the aggregate tax basis in each block of Pentair ordinary shares held immediately before the Distribution among (i) the nVent ordinary shares (including any fractional share deemed received) that were received with respect to that block of Pentair ordinary shares, and (ii) the Pentair ordinary shares in that block that were held by such person immediately after the Distribution. This allocation should be made in proportion to the relative fair market value, on the date of the Distribution, of the shares described in clause (i) of the immediately preceding sentence and the fair market value of the shares described in clause (ii) of the immediately preceding sentence.

In general, fair market value is the price at which property would change hands between a willing buyer and a willing seller, neither being under any compulsion to buy or to sell and both having reasonable knowledge of the facts. U.S. federal income tax law does not specifically prescribe how you should determine the fair market values of the Pentair ordinary shares and the nVent ordinary shares for purposes of allocating your tax basis. You should consult your tax advisor to determine what measure of fair market value is appropriate.

There are several possible methods for determining the fair market values of the Pentair ordinary shares and nVent ordinary shares on the date of the Distribution. One possible approach is to: (i) treat the fair market value of a Pentair ordinary share on the date of the Distribution as being equal to the closing trading price of Pentair ordinary shares on May 1, 2018 (the first trading day on which there was “regular way” trading of nVent ordinary shares); and (ii) treat the fair market value of each nVent ordinary share on the date of the Distribution as being equal to the closing trading price of nVent ordinary shares on May 1, 2018.

You are not bound by this particular approach, and you should consult your tax advisor to determine whether another approach should be used to determine the fair market values of the Pentair ordinary shares and the nVent ordinary shares.

The following is an example of the application of the use of this approach to allocate tax basis. This example assumes that immediately before the Distribution you owned a block of 100 Pentair ordinary shares (all of which you had acquired at the same time and at the same price). This example is based on the closing trading prices of Pentair ordinary shares and nVent ordinary shares on May 1, 2018, the first trading day after the Distribution. The example is provided solely for illustrative purposes and as a convenience to Pentair shareholders and their tax advisors.

### HYPOTHETICAL EXAMPLE OF BASIS ALLOCATIONS

*Assumptions:*

Pentair ordinary shares:	100 shares
Your tax basis in the Pentair ordinary shares immediately before the Distribution:	\$10 per share
Your aggregate tax basis in the Pentair ordinary shares immediately before the Distribution	\$1,000 (100 shares x \$10 per share)
nVent ordinary shares you received in the Distribution:	100 shares

Step 1: Calculate Aggregate Fair Market Values of Shares in the Distribution

In the Distribution, 100 nVent ordinary shares were received with respect to the 100 Pentair ordinary shares. The closing trading prices of Pentair ordinary shares and nVent ordinary shares on May 1, 2018, were \$44.82 and \$22.72, respectively.

Accordingly, the fair market value of the 100 Pentair ordinary shares that were held immediately after the Distribution is \$4,482.00 (=100 x \$44.82).

The fair market value of the 100 nVent ordinary shares received in the Distribution is \$2,272.00 (=100 x \$22.72).

Step 2: Calculate Tax Basis Allocation Percentages

The sum of the fair market value of the Pentair ordinary shares that were held immediately after the Distribution and the fair market value of the nVent ordinary shares received in the Distribution is \$6,754.00 (= \$4,482.00 + \$2,272.00). Hence, with respect to the aggregate tax basis in the Pentair ordinary shares immediately before the Distribution, 66.3607% (=4,482.00/6,754.00) of this aggregate tax basis is allocable to the Pentair ordinary shares held immediately after the Distribution, and 33.6393% (=2,272.00/6,754.00) of this tax basis is allocable to the nVent ordinary shares received in the Distribution.

Step 3: Apply the Tax Basis Allocation Percentages

The tax basis allocation percentages calculated in Step 2 are used to allocate the aggregate tax basis in the Pentair ordinary shares immediately before the Distribution (\$1,000) as follows:

(a) \$663.61 (=66.3607% x \$1,000) of the aggregate tax basis is allocable to the Pentair ordinary shares held immediately after the Distribution; and

(b) \$336.39 (=33.6393% x \$1,000) of the aggregate tax basis is allocable to the nVent ordinary shares received in the Distribution.

Please note that some brokerage firms may not use the information provided in this document, and this information is provided only as an example of one possible method. There are various ways brokerage firms may calculate tax basis. Please contact your brokerage firm to determine which calculation they may have used, and contact your tax advisor for additional information and clarification.

Please note further that, as described in the first paragraph under “GENERAL GUIDANCE REGARDING TAX BASIS IN A TAX-FREE SPIN-OFF” above, if you acquired blocks of Pentair ordinary shares at different times or different prices you will need to make a separate basis calculation for each block of Pentair ordinary shares.