

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 'ALPHA OLD TO ALPHA NEW' ATTACHMENT

18 Can any resulting loss be recognized? ▶ SEE 'ALPHA OLD TO ALPHA NEW' ATTACHMENT

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶
SEE 'ALPHA OLD TO ALPHA NEW' ATTACHMENT

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 ▶  Date ▶ July 29, 2021

Print your name ▶ BRAD NICHOL Title ▶ PRESIDENT

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|-------------------------------|----------------------------|----------------------|------|---|--------------|
| 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. |

ALPHA LITHIUM CORPORATION
'ALPHA OLD TO ALPHA NEW' FORM 8937 ATTACHMENT
REPORT OF ORGANIZATIONAL ACTIONS AFFECTING BASIS OF SECURITIES

Disclaimer

This Form 8937 including all attachments or related documents do not constitute tax advice. None of the documents analyzes any specific shareholder's facts and circumstances. Shareholders should seek independent counsel from qualified tax advisors regarding the U.S. tax consequences of the transaction described within this statement and its impact on their U.S. taxes.

This Form 8937 does not take into account any reduction to tax basis in the Alpha New Shares resulting from the receipt of Beta common shares pursuant to the Transaction, which is addressed in a separate Form 8937. This separate form can be found at the following link <https://alphalithium.com/investors/#spinout> described as 'Form 8937 #2'.

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 29, 2021, Alpha Lithium Corporation ("Alpha") undertook a plan of arrangement under the laws of Canada, pursuant to which each Alpha shareholder exchanged each Alpha common share (an "Alpha Old Share") for: (i) one new Alpha common share (an "Alpha New Share"), and (ii) 0.1 of a Beta Energy Corp. ("Beta") common share (together, the "Transaction"). No Alpha shareholder received a fractional share of Beta stock, and no cash was paid in lieu thereof. Any fractions resulting were rounded to the nearest whole number, with fractions of one-half or greater being rounded to the next higher whole number and fractions of less than one-half being rounded to the next lower whole number.

Form 8937, Part II, 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.

For U.S. federal income tax purposes, the exchange of Alpha Old Shares for Alpha New Shares is intended to be treated as a reorganization described in section 368(a)(1)(E) of the Internal Revenue Code ("Code"). Accordingly, a U.S. shareholder's aggregate tax basis in its Alpha New Shares received in the Transaction is expected to equal such shareholder's aggregate tax basis in its Alpha Old Shares immediately before the Transaction.

Form 8937, Part II, 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 adjusted tax basis of each Alpha New Share received in the Transaction should be the same as the adjusted tax basis of the Alpha Old Share exchanged therefore under section 358. For example, if a U.S. shareholder owned 20 Alpha Old Shares, 10 of which were acquired on Date 1 with an aggregate tax basis of \$100 (or \$10 per share), and 10 shares of which were acquired on Date 2 with an aggregate tax basis of \$80 (or \$8 per share), the U.S. shareholder would have 10 Alpha New Shares with an aggregate tax basis of \$100 (or \$10 per share) that are treated as having been acquired on Date 1 and 10 Alpha New Shares with an aggregate tax basis of \$80 (or \$8 per share) that are treated as having been acquired on Date 2.

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This example does not take into account any reduction to tax basis in the New Alpha Shares resulting from the receipt of Beta common shares pursuant to the Transaction, which is addressed in a separate Form 8937.

Form 8937, Part II, Line 17: List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based.

The applicable Code sections upon which the tax treatment of the exchange of Alpha Old Shares for Alpha New Shares is based are sections 354, 358, and 368.

Form 8937, Part II, Line 18: Can any resulting loss be recognized.

No loss should be recognized in connection with the Transaction.

Form 8937, Part II, Line 19: Provide any other information necessary to implement the adjustment, such as the reportable tax year.

The action occurred on July 29, 2021. The basis adjustment should be reported in the shareholder's taxable year that includes this date. For example, a shareholder who is a calendar year taxpayer, the action is reportable in the tax year ending December 31, 2021.