

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name Bunge Limited		2 Issuer's employer identification number (EIN) 98-0231912	
3 Name of contact for additional information Ruth Ann Wisener		4 Telephone No. of contact 314-292-2000	5 Email address of contact Ruthann.Wisener@bunge.com
6 Number and street (or P.O. box if mail is not delivered to street address) of contact Clarendon House, 2 Church Street			7 City, town, or post office, state, and ZIP code of contact Hamilton, Bermuda HDMX
8 Date of action March 18, 2022		9 Classification and description Automatic conversion of preferred stock into common stock.	
10 CUSIP number See Attachment	11 Serial number(s) NA	12 Ticker symbol BG	13 Account number(s) NA

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 ▶ See Attachment

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 Attachment

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 Attachment

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 Attachment

Blank lined area for listing applicable Internal Revenue Code sections.

18 Can any resulting loss be recognized? ▶ See Attachment

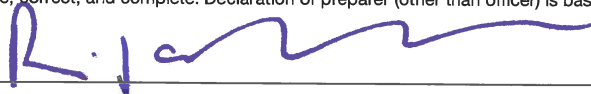
Blank lined area for indicating if a resulting loss can be recognized.

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

Blank lined area for providing other information necessary to implement the adjustment.

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 ▶ 4.22.22

Print your name ▶ **Rajat Gupta**

Title ▶ **Treasurer**

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 ▶				

Attachment to Form 8937-Report of Organizational Actions Affecting Basis of Securities

Bunge Limited (NYSE: BG)

EIN: 98-0231912

Part I, Box 10: CUSIP number

G16962105: Common Stock

G16962204: Automatically Converted Preferred Stock

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

Effective March 18, 2022, Bunge Limited's ("Bunge") outstanding 4.875% Cumulative Convertible Perpetual Preference Shares ("Preferred Stock", or "Preferred Shares") automatically converted into shares ("Common Shares") of Bunge common stock ("Common Stock"). The rate of conversion was 1.2846 Common Shares per share of Preferred Stock.

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

A holder's tax basis in Common Stock received upon conversion of Preferred Shares equals the holder's basis in such Preferred Shares under the rules applicable to recapitalizations. In the total transaction only a total of \$8 (eight dollars) was paid in lieu of fractional shares so any one person's receipt of cash would be de minimis.

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

See above, Line 15.

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

368(a)(1)(E) – Reorganization via Recapitalization
354(a) – Exchange of Stock in certain Reorganizations
358(a)(1) / 358(b)(1) – Basis to Distributees
1223(1) – Holding Period

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

No significant loss is expected as a result of these transactions as a total of only \$8 (eight dollars) was distributed as cash received in lieu of fractional shares of Common Stock in the entire transaction.

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

Bunge Limited completed the conversion on March 18, 2022. Consequently, the reportable tax year is 2022 with respect to calendar year taxpayers. None of the foregoing statements on this Form 8937 is intended to be tax advice. Tax advice should be obtained from your independent tax advisor.