Form **8937** (December 2017) Department of the Treasury Internal Revenue Service

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

OMB No. 1545-0123

Part I Reporting Issuer

1 Issuer's name: KRISPY KREME, INC.	**2 Issuer's employer identification number (EIN)**: 37-1701311

3 Name of contact for additional information: JOSEPH J. ESPOSITO	**4** Telephone No. of contact: 704-631-3802	**5** Email address of contact: JESPOSITO@KRISPYKREME.COM

6 Number and street (or P.O. box if mail is not delivered to street address) of contact: 1701 PENNSYLVANIA AVENUE NW, SUITE 801	**7** City, town, or post office, state, and ZIP code of contact:

8 Date of action: JUNE 30, 2021	**9** Classification and description: 1745-for-1 Stock Split

10 CUSIP number	**11** Serial number(s)	**12** Ticker symbol	**13** Account number(s)
50101L106		DNUT	

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 ▶ On June 28, 2021, the board of directors of Krispy Kreme, Inc. ("Krispy Kreme" or "Company") declared a 1,745-for-1 split of the Company's common shares. Each shareholder of record received 1,745 shares of common stock in exchange for each existing share held. The record date for the stock split was June 28, 2021, with new shares allocated on June 30, 2021.

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 ▶ As a result of the stock split, shareholders received 1,745 new shares for each existing share of Krispy Kreme held. The 1,745-for-1 stock split is anticipated to be treated as a reorganization pursuant to section 368(a)(1)(E) of the Internal Revenue Code. Each shareholder of Krispy Kreme will determine their basis in each new share of Krispy Kreme stock by reference to the basis in each of their shares of Krispy Kreme held immediately prior to the stock split adjusted for the exchange ratio.

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 discussion contained herein is provided only as guidance and should not be relied upon as tax advice. Shareholders are encouraged to consult their tax advisors with respect to the application of the foregoing rules to their respective situations.

As a result of the stock split, shareholders received 1,745 shares in exchange for each share held. As such, the number of shares held by each shareholder were multiplied by 1,745 but each shareholder's total basis remained the same. A shareholder will multiply the basis in each share held before the stock split by approximately 0.057% to determine the basis, after the stock split, of the shares received in the stock split.

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

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 368(a)(1)(E), 358(a), and 354(a).**

18 Can any resulting loss be recognized? ▶ **For U.S. Federal income tax purposes there will be no U.S. taxable income, gain or loss to U.S. resident shareholders in connection with the 1745-for-1 stock split. Shareholders are encouraged to consult their tax advisors with respect to the application of the foregoing rules to their respective situations.**

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ **The 1745-for-1 stock split was completed on June 30, 2021, thus the reportable year for the stock split for each shareholder is the taxable year of the shareholder that includes June 30, 2021.**

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 ▶ Joey Pruitt Date ▶ 8/20/21

Print your name ▶ JOEY PRUITT Title ▶ CHIEF ACCOUNTING OFFICER

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check ☐ 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