Report of Organizational Actions Affecting Basis of Securities

Part I Reporting Issuer

1 Issuer’s name
Yang Ming Marine Transport Corporation

3 Name of contact for additional information
Eason Wu

4 Telephone No. of contact
886-2-2466-0753

5 Email address of contact
easonwu@yangming.com

6 Number and street (or P.O. box if mail is not delivered to street address) of contact
271 Ming De 1st Road

7 City, town, or post office, state, and zip code of contact
Ciku, Keelung 206, Taiwan (Republic of China)

8 Date of action
May 4, 2017

9 Classification and description
Common Stock and Global Depository Shares (GDSs)

10 CUSIP number
984749101 / 984749200

11 Serial number(s)
TW0902699095 (Share)

12 Ticker symbol
YMTD LI YMMTY

13 Account number(s)
N/A

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 May 4, 2017, Yang Ming Marine Transport Corporation (the “Company”) authorized a 53.27115% capital reduction. As a result, shareholders of the Company will be required to exchange their existing shares of common stock (“Shares”) for new Shares at the rate of 487,288,85 new Shares for every 1,000 existing Shares.

In connection with this capital reduction, holders of GDSs will be required to surrender their GDSs (144A CUSIP # 984749101 and International CUSIP # 984749200) to the Depository to be exchanged for new GDSs (for new 144A CUSIP # 984749705 and new International CUSIP # 984749804) at a rate of 0.48728885 new GDS for every existing GDS surrendered, net of any applicable fees, taxes and expenses. No fractional new GDSs will be issued. Cash-in-lieu will be paid for fractional entitlements at a rate to be determined.

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 capital reduction, the aggregate U.S. tax basis of the existing Shares or GDSs held immediately prior to the capital reduction is to be allocated among the total new Shares or new GDSs held immediately after the capital reduction in accordance with fair market value. As 0.48728885 new Share or GDS will be received for each existing Share or GDS, 100% of the aggregate tax basis in the existing Shares or GDSs is to be allocated among the new Shares or GDSs received in the transaction, less any tax basis allocable to fractional entitlements. Holders of Shares or GDSs (“shareholders”) who acquired their Shares or GDSs on different dates and at different prices or who receive cash in lieu of fractional entitlements should consult their own tax advisors to determine their appropriate tax basis allocation.

16 Describe the calculation of the change in basis and the date that supports the calculation, such as the market values of securities and the valuation dates. In general, a shareholder’s aggregate tax basis in its Shares or GDSs, including any fractional entitlements, immediately after the capital reduction should equal its aggregate tax basis in its Shares or GDSs immediately before the capital reduction. However, because cash will be paid in lieu of fractional entitlements, a shareholder’s aggregate tax basis in its Shares or GDSs immediately after the capital reduction could be less than the shareholder’s aggregate tax basis in its Shares or GDSs immediately before the capital reduction by the amount of the tax basis allocable to the fractional entitlement.

For Paperwork Reduction Act Notice, see the separate Instructions.
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 tax treatment of the receipt of the new Shares or GDSs pursuant to the capital reduction is based on Sections 368(a)(1)(E) and 354(a)(1) of the Internal Revenue Code. The adjustment to a shareholder’s basis in its Shares or GDSs is determined pursuant to Section 358. The tax treatment of cash received in lieu of fractional entitlements is determined under Section 302 and will depend on each shareholder’s specific facts and circumstances.

18 Can any resulting loss be recognized? ➤ In general, a shareholder will not recognize loss as a result of the exchange of Shares or GDSs pursuant to the capital reduction unless such shareholder receives cash in lieu of a fractional entitlement. A shareholder that receives cash in lieu of a fractional entitlement generally will recognize loss if the amount of cash received was less than the shareholder’s tax basis allocable to such fractional entitlement in an amount equal to such difference as determined in U.S. dollars.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ➤ The reportable tax year for the capital reduction is 2017.

The information set forth on this Form 8937 does not constitute tax advice and does not take into account any specific facts and circumstances of shareholders and does not purport to be a complete summary of the tax consequences of the tax consequences of the capital reduction to a shareholder. Each shareholder should consult his/hers own tax advisor with respect to the tax consequences of the capital reduction.

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 ➤ [Signature]

Date ➤ [May 12, 2017]

Print your name ➤ [Dennis Lee]

Title ➤ Chief Financial Officer

Paid Preparer Use Only

Print/Type preparer’s name ➤ [Preparer’s Name]

Preparer’s signature ➤ [Preparer’s Signature]

Date ➤ [Date]

Check ☐ if self-employed

PTIN ➤ [PTIN]

Firm’s name ➤ [Firm’s Name]

Firm’s address ➤ [Firm’s Address]

Firm’s EIN ➤ [Firm’s EIN]

Phone no. ➤ [Phone Number]

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