

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

Report of Organizational Actions Affecting Basis of Securities

OMB No. 1545-0123

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name Adicet Bio, Inc.		2 Issuer's employer identification number (EIN) 81-3305277	
3 Name of contact for additional information Nick Harvey	4 Telephone No. of contact 650-503-9095	5 Email address of contact ir@adicetbio.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 1000 Bridge Parkway		7 City, town, or post office, state, and ZIP code of contact Redwood City, CA 94065	
8 Date of action December 30, 2025		9 Classification and description 1-for-16 reverse stock split Common Shares	
10 CUSIP number (NEW) 007002207	11 Serial number(s) N/A	12 Ticker symbol ACET	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 December 30, 2025, Adicet Bio, Inc. effected a reverse stock split transaction in which the company applied a 1-for-16 reverse stock split of its common shares. The CUSIP number changed from 007002108 to 007002207.**

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 ▶ **The transaction described in Line 14 qualified as a reorganization pursuant to section 368(a) of the Internal Revenue Code. No gain or loss was recognized by the shareholders as a result of the transaction. Each shareholder's aggregate tax basis held in all the common stock that was held immediately prior to the reverse stock split became the aggregate tax basis in the new amount of common stock held by such shareholders following the reverse stock split. A shareholder who would have otherwise been entitled to a fractional share as a result of the reverse stock split received cash in lieu thereof and was deemed for federal income tax purposes to have received and then immediately sold such fractional share for cash.**

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 ▶ **As noted in Line 15 above, the overall tax basis of each shareholder's total investment in the stock of Adicet Bio remains the same following the transaction described in Line 14. Therefore, the overall tax basis held in the shares did not change; however, the stock split reallocated each shareholder's tax basis attributable from 16 shares to 1 share of Adicet Bio common stock. Because no fractional shares were issued, the aggregate tax basis of Adicet Bio stock held by a shareholder immediately after the reverse stock split could be less than the pre-split aggregate tax basis by an amount equal to the aggregate tax basis allocated to the fractional shares, if any.**

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ _____

Section 368(a)(1)(E) - recapitalization

Section 354 - exchanges of stock and securities in certain reorganizations

Section 358 - basis to distributees

Revenue Ruling 72-57

18 Can any resulting loss be recognized? ▶ The shareholders did not recognize a loss for U.S. federal income tax purposes as a result of the transaction described on Line 14.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The adjustment to the tax basis of the shareholders' shares is applied in the tax year in which the transaction occurred. As such, tax basis in the shares is adjusted in 2025.

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.

DocuSigned by:
Signature ▶ *Nick Harvey* Date ▶ 1/8/2026
AE1BB7787EF64C8...

Paid Preparer Use Only

Print your name ▶ Nick Harvey Title ▶ Officer
Print/Type preparer's name ▶ David Fang Prepare'r's signature ▶ *David Fang* Date ▶ 1/7/2026 Check if self-employed PTIN ▶ P01552863
Firm's name ▶ Baker Tilly Advisory Group, LP Firm's EIN ▶ 39-0859910
Firm's address ▶ 300 Santana Row, STE 300, San Jose, CA 95128 Phone no. ▶ 408-558-7500