Report of Organizational Actions Affecting Basis of Securities

OMB No. 1545-2224

Dep:	artment of the Treasury nal Revenue Service			➤ See separate instructions.			
-	art I Reportin	a Issuer					
	Issuer's name				2 Issuer's employer ident	ification number (EIN)	
	NAGRA BRANDS, IN		47-0248710				
3	Name of contact for	additional information	4 Telephor	ne No. of contact	5 Email address of contact		
ERIC M. JOHNSON 402-240-4430 6 Number and street (or P.O. box if mail is not delivered to street address) of contact					FRIC.JOHNSON@CONAGR 7 City, town, or post office, star		
Ŭ	Number and succe to		. delivered to	street address) of contact	Posty, town, or post office, sta	e, and zip code of contact	
ELE	EVEN CONAGRA DR	IVE. 11-260	OMAHA, NE 68102	OMAHA, NE 68102			
8 Date of action 9 Classification and description							
************	VEMBER 9, 2016			N STOCK - SPIN OFF			
10	CUSIP number	11 Serial number	(s)	12 Ticker symbol	13 Account number(s)		
D.	205887102 art II Organiza	tional Action Attac	ah additiana	CAG	ee back of form for additional que		
14					te against which shareholders' owne		
1.4	the action ► SEE		аррпоаою, пт	s date of the action of the da	tte against which shareholders fowne	ship is measured for	
	<u>JLL</u>	ATTAOHLE					
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15	Describe the quant	itative effect of the oraș	anizational ac	tion on the basis of the secu	rity in the bands of a LLS taypayor or	an adjustment nev	
10	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 ATTACHED						
	5. a. a. a. p v.	3	EE ATTACHE			<del></del>	
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h						···	
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 ATTACHED					
	valuation dates 🟲 🧧	SEE ATTACHED					
						7.00 T-100	
					·		

Pai	rt II	Organizational Action (continued)	
17	List th	e applicable Internal Revenue Code section(s) and subsection(s)	upon which the tax treatment is based ▶ <u>SEE ATTACHED</u>
9-			
3			2-80/98/2012
2-			
·		904-5490, 5440	
35			
11		- XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	
18	Can a	ny resulting loss be recognized? ► SEE ATTACHED	
-			KRIMORE TO CONSORCE ST. SECTION OF COMM.
3 <del></del>			
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31			
1			
		Paramana 2 Table 2	
3			
138	8		
19	Drovic	le any other information necessary to implement the adjustment,	such as the reportable tay year > SEE ATTACHED
19	FIOVIC	e any other information necessary to implement the adjustment,	Such as the reportable tax year > SEE ATTACHED
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i <del>d</del>			
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	Un	der penalties of perium. I declare that I have examined this return, including	ing accompanying schedules and statements, and to the best of my knowledge and
		ef, it is true, correct, and complete. Declaration of preparer (other than off	
Sign	2200	FRICH Z	Date 11/18/16
1101	Sig	nature >	Date Date
	Deli	it your name ► ERIC M. JOHNSON	Title ► VICE PRESIDENT TAX
Paid		Print/Type preparer's name  Preparer's signature	Date Check if PTIN
	u pare	-	self-employed
	Only		Firm's EIN ▶
		Firm's address ▶	Phone no.
Send	Form 8	3937 (including accompanying statements) to: Department of the	Treasury, Internal Revenue Service, Ogden, UT 84201-0054