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 Reporting Issuer 1 Issuer's name		2 Issuer's employer identification number (EIN)
AEye, Inc. 3 Name of contact for additional information	A Talantana No. of control	37-1827430
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact
Nancy Huey	925-400-4366	info@aeye.ai
6 Number and street (or P.O. box if mail is not delivered to street address) of contact		7 City, town, or post office, state, and ZIP code of contact
4.5.4.51		
1 Park Place, Suite 200 8 Date of action	9 Classification and description	Dublin, California 94568
	o classification and decomplicit	
December 27, 2023	Common Stock	
10 CUSIP number 11 Serial number	s) 12 Ticker symbol	13 Account number(s)
See attachment	LIDR; LIDRW	COLUMN TO A CHARLEST DE MAN TOUR TOUR TOUR TO A TOUR TOUR TOUR TO A TOUR TOUR TOUR TOUR TOUR TOUR TOUR TOUR
	ch additional statements if peeded Sec	e back of form for additional questions.
15 Describe the quantitative effect of the orga	anizational action on the basis of the securit	y in the hands of a U.S. taxpayer as an adjustment per
	See attachment	y in the name of a city, taxpayor as an adjustment por
Describe the calculation of the change in by valuation dates ► See attachment	pasis and the data that supports the calcula	tion, such as the market values of securities and the
See attachment		
	Maria Cara Cara Cara Cara Cara Cara Cara	
STATE OF THE STATE		post Lyonati V
MIS - MIS		To the second se

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ See attach See attach See attach 18 Can any resulting loss be recognized? ▶ See attachment	
	ment
40. Con any year bling look he was a mined 0. Constitutional	
40. Con any year bling look he was a mined 0. Constitutional	
40. Con any year bling look he was a mined 0. Constitutional	A Name of nor
40. Con any year bling look he was a mined 0. Constitutional	
18 Can any resulting loss be recognized? ▶ See attachment	yearly rev
18 Can any resulting loss be recognized? ▶ See attachment	
18 Can any resulting loss be recognized? ► See attachment	L Park Prace
18 Can any resulting loss be recognized? ► See attachment	
18 Can any resulting loss be recognized? ► See attachment	Distance 21.
18 Can any resulting loss be recognized? ► See attachment	The Later Co.
	forth had
Andreas Back Man, of the Community States of the Community States of the Community Andreas of the Community States of the Comm	
Business out	
19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ► See attachment	
See attachment	
	I BUILDING O
magnetic record of the	
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 knowled	dge.
Sign Namble Date ▶ 01 12 20 24	
Signature ▶ Date ▶ Date ▶	
Print your name ► Nancy Huey Title ► Vice President, Accounting	2017
Check in	IN
Preparer Use Only Firm's name Firm's EIN	
Firm's address Firm's address Phone no. Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-00	Manager 1

AEye, Inc. EIN: 37-1827430 Attachment to Form 8937

Form 8937, Part I, Box 10:

CUSIP number: 008183204 (formerly 008183105)

Form 8937, Part II, Box 14:

On December 27, 2023, AEye, Inc. (the "Company") effected a 1-for-30 reverse stock split of its issued and outstanding shares of Common Stock (the "Reverse Stock Split"). Pursuant to the Reverse Stock Split, every thirty (30) shares of issued and outstanding shares of Common Stock were combined into one (1) share of Common Stock. The Company's publicly traded warrants will continue to be traded on Nasdaq under the symbol "LIDRW," however, under the terms of the applicable warrant agreement, the number of shares of Common Stock issuable on exercise of each warrant will be proportionately decreased. The Company did not issue fractional shares in connection with the Reverse Stock Split. Stockholders who were otherwise entitled to fractional shares of Common Stock were instead entitled to receive a proportional cash payment.

Form 8937, Part II, Box 15:

Stockholders are required to allocate their aggregate tax basis in their existing shares of Common Stock held immediately prior to the Reverse Stock Split among their shares of Common Stock held immediately after the Reverse Stock Split. Stockholders that have acquired different blocks of Common Stock at different times or at different prices should consult their own tax advisors regarding the allocation of the tax basis of such shares.

Form 8937, Part II, Box 16:

See response to Box 15, above. While the basis "per share" is impacted, the basis of the stockholder's total investment remains unchanged. Stockholders with blocks of pre-split shares of Common Stock not divisible by thirty (30) or which reflect pre-split shares of Common Stock acquired at different times or different prices must replicate such blocks of pre-split shares of Common Stock in the post-split shares of Common Stock received pursuant to a formula provided in Treasury regulations that seeks to preserve, to the greatest extent possible, the basis of a particular block of pre-split shares of Common Stock in one or more post-split shares of Common Stock received in exchange thereof. This may require the aggregate basis in one block of pre-split shares of Common Stock to be allocated to post-split shares of Common Stock in a manner where some post-split shares of Common Stock may have split basis and holding period segments.

Form 8937, Part II, Box 17:

The Reverse Stock Split is a non-taxable recapitalization pursuant to Section 368(a)(l)(E) of the Internal Revenue Code. Section 354(a)(l) provides that, in relevant part, no gain or loss shall be recognized if stock in a corporation is exchanged solely for stock in such corporation in a recapitalization. Section 358(a) provides that, in relevant part, the tax basis of stock in a corporation received in a recapitalization exchange will be the same as the tax basis in the stock exchanged. Tax treatment of the receipt of cash in lieu of fractional shares of stock is tested under Section 302 and will depend on each stockholder's specific facts and circumstances.

Form 8937, Part II, Box 18:

Except to the extent of cash received in lieu of fractional shares, the Reverse Stock Split is intended to be treated as a recapitalization for U.S. federal income tax purposes. Therefore, stockholders generally should not recognize gain or loss upon the Reverse Stock Split. A stockholder who receives cash in lieu of a fractional share pursuant to the Reverse Stock Split should recognize a capital gain or loss in an amount equal to the

difference between the amount of cash received and the stockholder's tax basis in the shares of Common Stock surrendered that is allocable to such share. Such capital gain or loss should be a long-term capital gain or loss if the stockholder's holding period for the shares of Common Stock surrendered exceeded one year at the effective date of the Reverse Stock Split. Stockholders should consult their own tax advisor with respect to the tax consequences resulting from the Reverse Stock Split.

Form 8937, Part II, Box 19:

The reportable tax year for reporting the tax effect of the Reverse Stock Split is the taxable year that includes December 27, 2023 (e.g., 2023 for calendar-year taxpayers).