

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

LG Display Co., Ltd.

**2** Issuer's employer identification number (EIN)

N/A

**3** Name of contact for additional information

**4** Telephone No. of contact

**5** Email address of contact

Jin Hwangbo

+82 2 3777 1679

jin.hwangbo@lgdisplay.com

**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

LG Twin Towers, 128 Yeoui-daero

Yeongdeungpo-gu, Seoul 07336, Rep. of Korea

**8** Date of action

**9** Classification and description

February 8, 2024

Share Rights offering / ADS Rights offering

**10** CUSIP number

**11** Serial number(s)

**12** Ticker symbol

**13** Account number(s)

50186V102 (ADSS)

034220.KS(shares) / LPL(ADSS)

## 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 ▶ See attachment.

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**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 ▶ See attachment.

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**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 attachment.

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**Part II Organizational Action** (continued)

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

Multiple horizontal lines for listing applicable Internal Revenue Code sections and subsections.

18 Can any resulting loss be recognized? ▶ See attachment.

Multiple horizontal lines for providing information regarding loss recognition.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ See attachment.

Multiple horizontal lines for providing other necessary information for the adjustment.

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.

Sign Here

Signature ▶ 

Date ▶ 25. APR. 2024

Print your name ▶ Philip Seo

Title ▶ Finance Team Leader

**Paid Preparer Use Only**

Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
Firm's name ▶			Firm's EIN ▶	
Firm's address ▶			Phone no.	

**Attachment to Form 8937: LG Display Co., Ltd.**

**Explanatory Note: This amended Form 8937 amends and restates the Form 8937 originally posted by LG Display Co., Ltd. in connection with the Share Rights Offering (as defined below) and the ADS Rights Offering (as defined below) on March 21, 2024 (the “Original Form 8937”). Holders of the Share Rights (as defined below) and the ADS Rights (as defined below) shall disregard the contents of the Original Form 8937 and instead review this amended Form 8937.**

**Part II**

Box 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.

The Share Rights Offering

On February 8, 2024, LG Display Co., Ltd. (the “Company”) distributed rights to purchase new shares of the Company’s common stock (such new shares, the “New Shares”, and such rights, the “Share Rights”) to holders of record of existing shares of the Company’s common stock (the “Existing Shares”) as of January 26, 2024 (the “Share Rights Offering”).

Each such holder was allocated 0.3178939325 Share Rights for each Existing Share owned by such holder. One (1) whole Share Right entitled the holder to purchase one (1) whole New Share. Holders of Share Rights could exercise their Share Rights on March 6 and March 7, 2024, at an exercise price of Korean Won (“KRW”) 9,090 (the “Share Subscription Price”). Any unexercised Share Rights expired without value at the end of such exercise period.

The Share Rights were listed on the Korean Exchange for five (5) trading days, from February 19 to February 23, 2024, during which the Share Rights could be publicly traded (the “Trading Period”).

The ADS Rights Offering

On February 8, 2024, the Company distributed nontransferable rights to purchase new American Depositary Shares, each representing one-half (1/2) of one share of the Company’s common stock (such American Depositary Shares, the “ADSs”, and such rights, the “ADS Rights”), to holders of record of the Company’s existing ADSs (the “Existing ADSs”) as of 5:00 P.M. (New York City time) on January 26, 2024 (the “ADS Rights Offering”).

Each such holder was allocated 0.3178939325 ADS Rights for each ADS owned by such holder. One (1) whole ADS Right entitled the holder to purchase one (1) whole new ADS. Holders of ADS Rights could exercise their ADS Rights between February 9, 2024, and March 1, 2024 at an estimated exercise price of \$4.18 per new ADS (the “Estimated ADS Subscription Price”). Any unexercised ADS Rights expired without value at the end of such exercise period.

The definitive exercise price for each ADR Right will be the U.S. dollar equivalent (based on the actual conversion rate of U.S. dollars into KRW) of the Share Subscription Price multiplied by 0.50, plus the ADS fee of \$0.04 charged by the Depositary (the “Definitive ADS Subscription Price”). As described in more detail in the Depositary Notice of Rights Offering, in the event that the Definitive ADS Subscription Price is ultimately less than the Estimated ADS Subscription Price, the depositary will return the corresponding difference to holders that had exercised ADS Rights; and in the event that the Definitive ADS Subscription Price ultimately exceeds the Estimated ADS Subscription Price, holders that had exercised ADS Rights are required either to pay the corresponding difference to the depositary or else to forfeit a number of new ADSs corresponding to such unpaid difference.

Box 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 Share Rights Offering

The following discussion assumes that a holder’s receipt of Share Rights pursuant to the Share Rights Offering is treated as a non-taxable distribution with respect to the holder’s Existing Shares for U.S. federal income tax purposes.

If a holder does not exercise or sell its Share Rights, then the holder’s tax bases in the corresponding Existing Shares will be the same as they were prior to the receipt of the Share Rights.

If the fair market value of the Share Rights received by a holder is at least 15% of the fair market value of its Existing Shares on the date of the distribution, then, except as discussed in the preceding paragraph, the holder must allocate its basis in its Existing Shares between the Existing Shares and the Share Rights in proportion to their relative fair market values as determined on the date it receives the Share Rights. On the other hand, if the fair market value of the Share Rights received by a holder is less than 15% of the fair market value of the holder’s Existing Shares on the date of the distribution, the Share Rights will be allocated a basis of zero for U.S. federal income tax purposes, unless such holder affirmatively elects to allocate its basis in its Existing Shares between its Existing Shares and the Share Rights in proportion to their relative fair market values as determined on the date of the distribution. This is made on the holder’s tax return for the taxable year in which it receives the Share Rights. Such election is irrevocable once made.

We have assumed for purposes of the illustrative calculations below that the distribution occurred on February 8, 2024, the date when the Share Rights were generally first reflected in holders’ accounts (the “Share Rights Distribution Date”).

The method for determining the fair market value of the Share Rights is uncertain. The Company has not obtained, and does not intend to obtain, an independent appraisal of the fair market value of the Share Rights on the Share Rights

Distribution Date. Please see, however, Part II, Box 16 for indicative prices based on publicly available trading information.

### The ADS Rights Offering

The following discussion assumes that a holder's receipt of ADS Rights pursuant to the ADS Rights Offering is treated as a non-taxable distribution with respect to the holder's Existing ADSs for U.S. federal income tax purposes.

If a holder does not exercise or sell its ADS Rights, then the holder's tax bases in the corresponding Existing ADSs will be the same as they were prior to the receipt of the ADS Rights.

If the fair market value of the ADS Rights received by a holder is at least 15% of the fair market value of its Existing ADSs on the date of the distribution, then, except as discussed in the preceding paragraph, the holder must allocate its basis in its Existing ADSs between the Existing ADSs and the ADS Rights in proportion to their relative fair market values as determined on the date it receives the ADS Rights. On the other hand, if the fair market value of the ADS Rights received by a holder is less than 15% of the fair market value of the holder's Existing ADSs on the date of the distribution, the ADS Rights will be allocated a basis of zero for U.S. federal income tax purposes, unless such holder affirmatively elects to allocate its basis in its Existing ADSs between its Existing ADSs and the ADS Rights in proportion to their relative fair market values as determined on the date of the distribution. This is made on the holder's tax return for the taxable year in which it receives the ADS Rights. Such election is irrevocable once made.

We have assumed for purposes of the illustrative calculations below that the distribution occurred on February 8, 2024, the date when the ADS Rights were generally first reflected in holders' accounts (the "ADS Rights Distribution Date").

The method for determining the fair market value of the ADS Rights is uncertain. The Company has not obtained, and does not intend to obtain, an independent appraisal of the fair market value of the ADS Rights on the ADS Rights Distribution Date. Moreover, given that the ADS Rights were non-transferable, no trading information for the ADS Rights was available.

For purposes of the calculations in Part II, Box 16, below, we have assumed that the fair market value of the ADS Rights is equal to 0.50 times the fair market value of the Share Rights (as each ADS represents 0.50 of a Share).

Box 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 Share Rights Offering

The 5-day volume weighted average price ("VWAP") of the Existing Shares during the Trading Period was KRW 11,791.61. The 5-day VWAP of the Share Rights

during the Trading Period was KRW 1,913.40. Accordingly, the 0.3178939325 Share Rights that each holder was allocated for each Existing Share owned by such holder had a 5-day VWAP equal to 0.3178939325 times KRW 1,913.40, or KRW 608.26. Assuming that these figures are representative of the fair market values of the Existing Shares and the Share Rights, respectively, on the Share Rights Distribution Date (for which no corresponding valuation information is otherwise available), the Company believes that it is reasonable to treat the fair market value of a Share Right as less than 15% of the fair market value of the related Existing Share on the Share Rights Distribution Date. As a result, subject to the exceptions discussed above, the Share Rights will be allocated a basis of zero for U.S. federal income tax purposes, unless the holder affirmatively elects to allocate its basis in its Existing Shares between its Existing Shares and the Share Rights in proportion to their relative fair market values as determined on the date of the distribution.

If we assume that a holder affirmatively electing to allocate its basis as described above has a tax basis of KRW 15,000.00 in an Existing Share, then the electing holder would allocate basis as follows (these numbers are supplied for illustrative purposes only):

Using the 5-day VWAP for each of the Existing Shares and the Share Rights during the Trading Period as an estimate of the relative fair market values of the Existing Shares and the Share Rights on the Share Rights Distribution Date, the Existing Shares would be allocated 95.0946% of the basis and the Share Rights would be allocated 4.9054% of the basis. These numbers were calculated by dividing the 5-day VWAP of the Existing Shares and the 0.3178939325 Share Rights during the Trading Period by their combined 5-day VWAPs (KRW 11,791.61 divided by KRW 12,399.87, and KRW 608.26 divided by KRW 12,399.87, respectively). Each Existing Share would therefore be apportioned KRW 14,264.19 of basis, and each 0.3178939325 Share Rights would be apportioned KRW 735.81 of basis, calculated by multiplying the respective percentages by the electing holder's basis in an Existing Share at the time of the distribution (assumed to be KRW 15,000.00 in this example).

Holdings should consult their tax advisors regarding the allocation of basis between the Share Rights and the Existing Shares.

#### The ADS Rights Offering

No trading information is available for the ADS Rights. However, the Company believes that, consistent with the reasoning discussed above for the Share Rights Offering, it is reasonable to treat the fair market value of an ADS Right as less than 15% of the fair market value of the related Existing ADS on the ADS Rights Distribution Date. As a result, subject to the exceptions discussed above, the ADS Rights will be allocated a basis of zero for U.S. federal income tax purposes, unless the holder affirmatively elects to allocate its basis in its Existing ADSs between its

Existing ADSs and the ADS Rights in proportion to their relative fair market values as determined on the date of the distribution.

If we assume that a holder affirmatively electing to allocate its basis as described above has a tax basis of \$6.00 in an Existing ADS, then the holder would allocate basis as follows (these numbers are supplied for illustrative purposes only):

Using the 5-day VWAP for each of the Existing Shares and the Share Rights during the Trading Period as an estimate of the relative fair market values of the Existing ADSs and the ADS Rights on the ADS Rights Distribution Date, the Existing ADSs would be allocated 95.0946% of the basis and the ADS Rights would be allocated 4.9054% of the basis. These numbers were calculated by dividing the 5-day VWAP of the Existing Shares and the 0.3178939325 Share Rights during the Trading Period by their combined 5-day VWAPs (KRW 11,791.61 divided by KRW 12,399.87, and KRW 608.26 divided by KRW 12,399.87, respectively). Each Existing ADS would therefore be apportioned \$5.71 of basis, and each 0.3178939325 ADS Right would be apportioned \$0.29 of basis, calculated by multiplying the respective percentages by the electing holder's basis in an Existing ADS at the time of the distribution (assumed to be \$6.00 in this example).

Holders should consult their tax advisors regarding the allocation of basis between the ADS Rights and the Existing ADSs.

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

The assumed treatment of the distribution of Share Rights or ADS Rights to holders of Existing Shares or Existing ADSs, respectively, as a non-taxable distribution is based on Sections 305(a) and 305(d) of the U.S. Internal Revenue Code of 1986, as amended (the "Code") and Treasury Regulations Section 1.305-1. The tax basis calculations described above and elections with regard to such calculations are described in Section 307 of the Code and Treasury Regulations Sections 1.307-1 and 1.307-2.

Box 18. Can any resulting loss be recognized?

N/A.

Box 19. Provide any other information necessary to implement the adjustment, such as the reportable tax year.

For a holder whose taxable year is the calendar year, the reportable year is 2024.