

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name		2 Issuer's employer identification number (EIN)	
Horizon Kinetics Holding Corporation		84-0920811	
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact	
Jay Kesslen	646-495-7333	legal@horizonkinetics.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	
470 Park Ave. S.		New York, New York, 10016	
8 Date of action		9 Classification and description	
August 1, 2024		Reverse Stock Split - Common Stock	
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)
439913104	N/A	HKHC	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 ▶ **Effective August 1, 2024, the Issuer effected a 1-for-20 reverse stock split of its common stock (the "Reverse Split"). Pursuant to the Reverse Split, every twenty (20) issued and outstanding common shares of the Issuer (each a "Common Share") was converted into one (1) Common Share. Shareholders who would have otherwise been entitled to a fractional Common Share as a result of the Reverse Split received cash in lieu thereof and were deemed for federal income tax purposes to have received and then immediately sold such fractional Common Share for cash.**

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 Reverse Split, each shareholder is required to allocate its aggregate tax basis in its Common Shares held immediately prior to the Reverse Split ("Pre-Split Shares") among its Common Shares held immediately after the Reverse Split ("Post-Split Shares"), including among any fractional Common Shares deemed to be received. Shareholders who acquired different blocks of Common Shares at different times or different prices prior to the Reverse Split are urged to consult their own tax advisors regarding the allocation of their aggregate tax basis among, and the holding period of, those Common Shares.**

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 ▶ **While the tax basis per Common Share is impacted by the Reverse Split, the aggregate tax basis of each Shareholder's total investment in the Common Shares (including any fractional Common Shares deemed to be received) remains unchanged. Generally, each shareholder's tax basis per Post-Split Share is twenty (20) times greater than its tax basis per Pre-Split Share. However, shareholders holding blocks of Pre-Split Shares which (i) are not divisible by twenty (20), and (ii) reflect Common Shares purchased at different times or different prices, must replicate such blocks of Pre-Split Shares in their Post-Split Shares pursuant to a formula provided in the Treasury Regulations. This formula seeks to preserve, to the greatest extent possible, the basis of a particular block of Pre-Split Shares in one or more Post-Split Shares received in exchange therefor. This may require the aggregate tax basis in one block of Pre-Split Shares to be allocated to Post-Split Shares in a manner such that some Post-Split Shares may have split tax basis and holding period segments.**

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ Sections 354(a)(1), 358(a), 368(a)(1)(E), 1223(1), 1001, and 1012.

18 Can any resulting loss be recognized? ▶ The Reverse Split is intended to be treated as a non-taxable recapitalization for U.S. federal income tax purposes. Therefore, except as described below with respect to cash received in lieu of fractional shares, the shareholders should not recognize gain or loss for U.S. federal income tax purposes as a result of the Reverse Split.


In general, a shareholder who receives a cash payment in lieu of a fractional share recognizes capital gain or loss equal to the difference between the amount of cash received in lieu of the fractional share and the portion of the shareholder's tax basis in the Pre-Split Shares that is allocable to the fractional share. This gain or loss is generally long-term capital gain or loss if the shareholder's holding period in its Pre-Split Shares was more than one year as of the date of the Stock Split. The deductibility of net capital losses by individuals and corporations is subject to limitations. Shareholders are urged to consult their own tax advisors with respect to their individual tax consequences resulting from the Stock Split.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The reportable tax year in which the Reverse Split occurred in 2024.

The information set forth in this Form 8937 does not constitute tax advice, does not take into account any shareholder's specific facts and circumstances, and does not purport to be a complete summary of the tax consequences of the Reverse Split to a shareholder. Each shareholder should consult its own tax advisor with respect to the tax consequences of the Reverse Split.

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 ▶ 09-14-2024

Print your name ▶ Jay Kessler Title ▶ General Counsel

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.