Form **8937**(December 2017)
Department of the Treasury

Report of Organizational Actions Affecting Basis of Securities

► See separate instructions.

OMB No. 1545-0123

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Pa	art I Reporting	Issuer			
1	Issuer's name		2 Issuer's employer identification number (EIN)		
Kor	ro Bio. Inc. (f/k/a Fregu	ency Therapeutics.	47-2324450		
Korro Bio, Inc. (f/k/a Frequency Therapeutics, Inc.) 3 Name of contact for additional information 4 Telephone				ne No. of contact	5 Email address of contact
The state of contact to additional members of the state o					
				(781) 315-4600	
6	Number and street (or F	P.O. box if mail is not	7 City, town, or post office, state, and ZIP code of contact		
One	e Kendall Square, Build	ling 600-700	Cambridge, MA 02139		
8 Date of action 9 Class				sification and description	
Nov	vember 3, 2023		Commo	n Stock	
	CUSIP number	11 Serial number(12 Ticker symbol	13 Account number(s)
					(4)
В	500946108	anal Antion Alle	- I I-I'I'	KRRO	Death and from the additional acceptance
					See back of form for additional questions.
14	Describe the organizathe action ► See att		applicable, the	e date of the action or the d	ate against which shareholders' ownership is measured for
15	Describe the quantitates share or as a percentage				urity in the hands of a U.S. taxpayer as an adjustment per
16	Describe the calculati valuation dates ► See	•	pasis and the	data that supports the calc	ulation, such as the market values of securities and the

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Part		Organizational Action (continu	ued)						
17 Lis	st the	applicable Internal Revenue Code se	ction(s) and subsection(s) upon w	hich the tax treatment is based	>				
See atta	chme	ent.							
18 Ca	an any	resulting loss be recognized? ► Se	e attachment.						
19 Pr	ovide	any other information necessary to in	nplement the adjustment, such as	s the reportable tax year ► See	attachment.				
-	Linda	r penalties of perjury, I declare that I have	examined this return, including acco	mnanying echedules and statemen	te, and to the best of my knowledge and				
		, it is true, correct, and complete. Declarat							
Sign		— DocuSigned by:							
Here	Ciana	ture Vineet agarwal	12/19	Date > 12/19/2023					
	Sigila	SBF021EDBC0A4GE	Bate						
	Drint :	Vineet Agarwal yourname►	Title ▶ CF0						
	r mmt	Print/Type preparer's name	Preparer's signature	Date	Observation of PTIN				
Paid		, , <u>F</u>			Check if '''' self-employed				
Prepa		Firm's name ▶			Firm's EIN ▶				
Use C	nly	Firm's name			Phone no.				
Send Fo	rm 89	37 (including accompanying stateme	nts) to: Department of the Treasu	ıry, Internal Revenue Service. O					

Korro Bio, Inc. (f/k/a Frequency Therapeutics, Inc.) EIN: 47-2324450 Attachment to Form 8937 Date of Organizational Action: November 3, 2023

The information contained herein does not constitute tax advice and does not purport to be complete or to describe the consequences that may apply to particular categories of shareholders. Each shareholder is advised to consult his or her tax advisor regarding the tax treatment of the transaction. Further discussion of the tax consequences of the merger can be found in the Form S-4/A Registration Statement filed by with the Securities and Exchange Commission on September 28, 2023, under the heading "Material U.S. Federal Income Tax Consequences of the Merger." (available at https://www.sec.gov/ix?doc=/Archives/edgar/data/0001703647/000119312523244637/d451428/ds4a.htm) (the "Form S-4")

Form 8937, Part II, Box 14:

On November 3, 2023, pursuant to the Agreement and Plan of Merger dated as of July 14, 2023 (the "Merger Agreement"), by and among Frequency Therapeutics, Inc., a Delaware corporation ("Frequency"), Korro Bio, Inc., a Delaware corporation ("Legacy Korro"), and Frequency Merger Sub, Inc., a Delaware corporation and wholly owned subsidiary of Frequency ("Merger Sub"), Merger Sub merged with and into Legacy Korro, with Legacy Korro surviving as a wholly owned subsidiary of Frequency (the "Merger"). In connection with the completion of the Merger, Frequency changed its name from "Frequency Therapeutics, Inc." to "Korro Bio, Inc."

Pursuant to the terms of the Merger Agreement, at the effective time of the Merger, holders of Legacy Korro common stock exchanged their Legacy Korro stock in exchange for Frequency common stock. Following the closing of the merger, there are approximately 8,001,283 shares of the combined company's common stock outstanding, with prior Frequency stockholders owning approximately 9.5% and prior Legacy Korro stockholders (including investors in the preclosing private placement) holding approximately 90.5% of the combined company's outstanding common stock.

Form 8937, Part II, Box 15:

As described in the Form S-4, the Merger is intended to qualify as a "reorganization" within the meaning of Section 368(a) of the Internal Revenue Code of 1986, as amended (the "Code"). Assuming the Merger qualifies as a "reorganization" within the meaning of Section 368(a) of the Code, U.S. holders of Legacy Korro common stock that exchange their Legacy Korro stock for Frequency common stock in the Merger generally should not recognize gain or loss for U.S. federal income tax purposes on such exchange. In such case, the aggregate adjusted tax basis of the Frequency common stock received in the Merger by a U.S. holder should be equal to the adjusted tax basis of the Legacy Korro common stock surrendered in the Merger in exchange therefor and the holding period of the Frequency common stock should include the holding period during which the Legacy Korro common stock surrendered in the Merger in exchange therefor.

U.S. holders who held shares of Legacy Korro common stock with differing tax bases and/or holding periods, which generally occurs when blocks of shares are purchased at different times or at different prices, should consult with their own tax advisors with respect to the particular U.S. federal income tax consequences of the Merger to them.

Form 8937, Part II, Box 16:

See response to Box 15 above.

Form 8937, Part II, Box 17:

The Merger is intended to qualify as a "reorganization" within the meaning of Section 368(a) of the Code and not to result in gain recognition to the U.S. holders of Legacy Korro common stock. The Merger Agreement is intended to qualify as a "plan of reorganization" for purposes of Sections 354, 361 and 368 of the Code and within the meaning of Treasury Regulations Sections 1.368-2(g) and 1.368-3(a). The tax consequences of the Merger to the shareholders of Legacy Korro are determined pursuant to Sections 354(a), 358(a), 368(a) and 368(b) of the Code and Treasury Regulations Section 1.358-2.

Form 8937, Part II, Box 18:

Since the Merger is intended to qualify as a "reorganization" within the meaning of Section 368(a) of the Code, a U.S. holder of Legacy Korro common stock will not recognize any loss upon receipt of Frequency common stock in the Merger.

Form 8937, Part II, Box 19:

The Merger was consummated on November 3, 2023. Consequently the reportable tax year is the tax year that includes the November 3, 2023 date.