

TYCO ELECTRONICS COMMON STOCK TAX BASIS CALCULATION

In this example, 105 shares of Tyco International common stock were purchased for \$26.00 per share, resulting in a tax basis of \$2,730.00. The original tax basis of \$2,730.00 must now be allocated to the post-distribution shares of Tyco International common stock and the newly-received shares of Tyco Electronics and Covidien common stock (including any fractional share interests of Tyco International, Tyco Electronics, and Covidien).

Post-Distribution Tax Basis Per Share of Tyco Electronics Common Stock									
<u>Example:</u>	\$2,730.00	x	29.23%*	=	\$797.98	÷	26.25	=	\$30.40
	Original tax basis		Allocated ratio		Post-distribution total tax basis of Tyco Electronics common stock		Total number of shares (based on one Tyco Electronics share for every four Tyco International shares) (105 ÷ 4)		Post-distribution tax basis per share of Tyco Electronics common stock (including any fractional share interest)
<u>Calculate your post-distribution tax basis per share of Tyco Electronics common stock</u>									
	[]	x	29.23%*	=	[]	÷	[]	=	[]
	Original tax basis		Allocated ratio		Post-distribution total tax basis of Tyco Electronics common stock		Total number of shares (based on one Tyco Electronics share for every four Tyco International shares) (Pre-distribution shares ÷ 4)		Post-distribution tax basis per share of Tyco Electronics common stock (including any fractional share interest)

* Based on closing share prices quoted on the New York Stock Exchange on July 2, 2007.

Tax Basis of Fractional Share of Tyco Electronics Common Stock					
<u>Example:</u>	\$30.40	x	0.25	=	\$7.60
	Post-distribution tax basis per share of Tyco Electronics common stock (including any fractional share interest)		Fractional share of Tyco Electronics common stock		Tax basis of fractional share of Tyco Electronics common stock
<u>Calculate your Tyco Electronics common stock fractional share tax basis:</u>					
	[]	x	[]	=	[]
	Post-distribution tax basis per share of Tyco Electronics common stock (including any fractional share interest)		Fractional share of Tyco Electronics common stock		Tax basis of fractional share of Tyco Electronics common stock
Gain or Loss from Sale of Fractional Share of Tyco Electronics Common Stock					
<u>Example:</u>	\$9.99	-	\$7.60	=	\$2.39
	Cash received in lieu of fractional share of Tyco Electronics common stock		Tax basis of fractional share of Tyco Electronics common stock		Gain (Loss) from sale of fractional share of Tyco Electronics common stock
<u>Calculate your gain or loss from sale of fractional share of Tyco Electronics common stock:</u>					
	[]	-	[]	=	[]
	Cash received in lieu of fractional share of Tyco Electronics common stock		Tax basis of fractional share of Tyco Electronics common stock		Gain (Loss) from sale of fractional share of Tyco Electronics common stock