

► See separate instructions.

## Part I Reporting Issuer

<b>1</b> Issuer's name  <b>Eastern Bankshares, Inc.</b>		<b>2</b> Issuer's employer identification number (EIN)  <b>84-4199750</b>	
<b>3</b> Name of contact for additional information  <b>Andrew Hersom</b>	<b>4</b> Telephone No. of contact  <b>781-598-7920</b>	<b>5</b> Email address of contact  <b>InvestorRelations@easternbank.com</b>	
<b>6</b> Number and street (or P.O. box if mail is not delivered to street address) of contact  <b>601 Edgewater Drive</b>		<b>7</b> City, town, or post office, state, and ZIP code of contact	
<b>8</b> Date of action  <b>11/01/2025</b>		<b>9</b> Classification and description  <b>IRC 368(a) - Tax Free Merger - see attachment</b>	
<b>10</b> CUSIP number  <b>See Attachment</b>	<b>11</b> Serial number(s)	<b>12</b> Ticker symbol  <b>See Attachment</b>	<b>13</b> Account number(s)  <b>N/A</b>

**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](#)

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**

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**

## 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

18 Can any resulting loss be recognized? ► See Attachment

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ► [See Attachment](#)

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 ► J. D. Rosario

Date ► 12/11/2025

Print your name ► **David Rosato**

**Title ► Chief Financial Officer**

## **Paid Preparer Use Only**

Print/Type preparer's name

Preparer's signature

Da

Check  if  
self-employed

**Firm's name** ►

Firm's EIN ►

Firm's name ►

PHOTOGRAPH

Eastern Bankshares, Inc., as acquiror of HarborOne Bancorp, Inc. (FEIN 81-1607465).

**Attachment to FORM 8937**

**Date of Organizational Action – November 1, 2025**

**REPORT OF ORGANIZATIONAL ACTIONS AFFECTING BASIS OF SECURITIES**

**FORM 8937 - Part II – 9:**

Pursuant to an Agreement and Plan of Merger, dated April 24, 2025, on November 1, 2025 HarborOne Bancorp, Inc., the bank holding company for HarborOne Bank, merged with and into Eastern Bankshares, Inc., the bank holding company for Eastern Bank, with Eastern Bankshares, Inc. continuing as the surviving entity. Immediately following the bank holding company merger, HarborOne Bank merged with and into Eastern Bank, with Eastern Bank continuing as the surviving entity.

**FORM 8937 - Part II – 10 & 12:**

Eastern Bankshares, Inc. – Common Stock NASDAQ: EBC  
CUSIP: 27627N105 (\$0.01 par Common Share)

HarborOne Bancorp, Inc. – Common Stock NASDAQ: HONE  
CUSIP: 41165Y100 (\$1.00 par Common Share)

**FORM 8937 - Part II – 14:**

On November 1, 2025, Eastern Bankshares, Inc. completed a merger with HarborOne Bancorp, Inc. Pursuant to the Agreement and Plan of Merger, at the time of merger, each share of outstanding HarborOne Bancorp, Inc. common stock, par value \$1.00 per share, immediately prior to the merger was converted into the right to receive, at the election of the holder, either (i) 0.765 shares of common stock, par value \$0.01 per share, of Eastern Bankshares, Inc. or (ii) \$12.00 in cash, subject to proration procedures set forth in the Agreement and Plan of Merger to ensure that between 75% and 85% of the shares of HarborOne Bancorp, Inc. were converted into shares of Eastern Bankshares, Inc. Cash was paid in lieu of fractional shares of Eastern Bankshares, Inc. common stock.

**FORM 8937 - Part II – 15:**

Eastern Bankshares, Inc. believes that the merger will be treated for federal income tax purposes as a tax-free reorganization under Section 368(a) of the Internal Revenue Code. Holders of HarborOne Bancorp, Inc. common stock who exchanged their shares for cash generally will recognize capital gain or loss equal to the difference between the amount of cash received and the tax basis of such shares. Holders of HarborOne Bancorp, Inc. common stock who exchanged their shares for shares of Eastern Bankshares, Inc. common stock generally will not recognize gain or loss for U.S. federal income tax purposes, except with respect to any cash received in lieu of fractional shares. Each holders' aggregate tax basis in the shares of Eastern Bankshares, Inc. common stock received pursuant to the merger (including any fractional shares for which cash was received) will equal such holder's aggregate adjusted tax basis in the shares of HarborOne Bancorp, Inc. common stock surrendered in the merger. Each holder that receives cash in lieu of fractional shares of Eastern Bankshares, Inc. generally will recognize

**Eastern Bankshares, Inc., as acquiror of HarborOne Bancorp, Inc. (FEIN 81-1607465).  
Attachment to FORM 8937 (con't)**

capital gain or loss equal to the difference between the amount of cash received and the tax basis in such fractional shares, determined as described above.

This information does not constitute tax advice and provides a description of common tax consequences but does not purport to describe all tax consequences that may apply to all types of shareholders. Each shareholder should consult their own tax advisor regarding the specific consequences of the stock exchange on tax basis and holding period, including applicability of any U.S. federal, state and local, and foreign tax laws.

**FORM 8937 - Part II – 16:**

See response to item 15 above.

**FORM 8937 - Part II – 17:**

Sections 368

Section 354

Sections 358

Section 1221

**FORM 8937 - Part II – 18:**

In general, HarborOne Bancorp, Inc., shareholders who received shares of Eastern Bankshares, Inc. will not recognize any gain or loss for U.S. federal income tax purposes by reason of the reorganization, except with respect to the cash received in lieu of fractional shares of Eastern Bankshares, Inc. common stock as described in Item 15 above. In general, HarborOne Bancorp, Inc. shareholders who received cash will recognize capital gain or loss equal to the difference between the amount of cash received and the tax basis in such shares.. This information does not constitute tax advice and provides a description of common tax consequences but does not purport to describe all tax consequences that may apply to all types of shareholders. Each shareholder should consult their own tax advisor regarding the specific consequences of the stock exchange on tax basis and holding period, including applicability of any U.S. federal, state and local, and foreign tax laws.

**FORM 8937 - Part II – 19:**

The merger and resulting stock exchange were effective on November 1, 2025. Therefore, the reportable tax year is the 2025 calendar year.