

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ _____
Internal Revenue Code Sections 301, 316, 852

18 Can any resulting loss be recognized? ▶ No

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ _____
See Statement 1 for the per share amounts and dates of distributions impacted by this organizational action.
This organizational action is reportable with respect to calendar year 2025.

Sign Here
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.
Signature ▶ John C. Ball Date ▶ 03/19/2026
Print your name ▶ John Ball Title ▶ Treasurer

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input checked="" type="checkbox"/> if self-employed	PTIN
	<u>Allie Ratner</u>	<u>Allie Ratner</u>	<u>3/19/2026</u>		<u>P01257160</u>
	Firm's name ▶ <u>Deloitte Tax LLP</u>	Firm's EIN ▶ <u>86-1065772</u>		Phone no. <u>303-292-5400</u>	
	Firm's address ▶ <u>1601 Wewatta Street, Suite 400, Denver, CO 80202</u>				

THE GDL Fund
 F.E.I.N. 20-8195443
 FOR THE TAXABLE PERIOD ENDED DECEMBER 31, 2025
ATTACHMENT TO FORM 8937

NON-TAXABLE RETURN OF CAPITAL

Class	Ticker	Cusip	Distribution Payable Date	Per Share Reduction of Basis in Stock
COMMON STOCK	GDL	361570104	03/24/25	\$ 0.024900000
COMMON STOCK	GDL	361570104	06/23/25	\$ 0.024900000
COMMON STOCK	GDL	361570104	09/23/25	\$ 0.024900000
COMMON STOCK	GDL	361570104	12/19/25	\$ 0.024900000
SERIES C CUMULATIVE PREFERRED SHARES		361570401	03/26/25	\$ 0.000000000
SERIES E CUMULATIVE PREFERRED SHARES		361570500	03/26/25	\$ 0.000000000
SERIES E CUMULATIVE PREFERRED SHARES		361570500	06/26/25	\$ 0.000000000
SERIES E CUMULATIVE PREFERRED SHARES		361570500	09/26/25	\$ 0.000000000
SERIES E CUMULATIVE PREFERRED SHARES		361570500	12/26/25	\$ 0.000000000
SERIES G CUMULATIVE PREFERRED SHARES		361570609	09/26/25	\$ 0.000000000