Golub Capital BDC, Inc. Instructions for Filing Form 8937 Report of Organizational Actions Affecting Basis of Securities For the year ended September 30, 2020

Signature...

The original Form 8937 should be signed by an authorized officer of Golub Capital BDC, Inc.

Filing...

The signed Form 8937 should be should be filed on or before May 23, 2020 with:

Department of the Treasury Internal Revenue Services Ogden, UT 84201-0054

To document the timely filing of your tax return, we suggest that you obtain and retain proof of mailing. Proof of mailing can be accomplished by sending the tax return by registered or certified mail (metered by the U.S. Postal Service) or through the use of an IRS approved delivery method provided by an IRS designated private delivery service.

Payment of Tax...

No payment of tax should be made with Form 8937.

► See separate instructions.

Pa	Reporting	ssuer							
1	Issuer's name		2 Issuer's employer identification number (EIN)						
GOI	LUB CAPITAL BDC, IN	С.		27-2326940					
3 Name of contact for additional information 4 Telephone No. of contact							5 Email address of contact		
ROSS A. TEUNE 312-284-0111									
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		
666	FIFTH AVENUE, 18TH	FLOOR		NEW YORK, NY 10103					
8 Date of action 9 Classification and description									
04/08/2020				RIGHTS OFFERING					
10	CUSIP number	JSIP number 11 Serial number(s)		12 Ticker symbol			13 Account number(s)		
	38173M102	N/A			GBDC		N/A		
Pa	rt II Organizatio	onal Action Attac	h ad	ditional	statements if needed.	See bac	k of form for additional questions.		
14	Describe the organiza	tional action and, if a	pplica	able, the	date of the action or the	date agai	inst which shareholders' ownership is measured for		
	the action ► SEE A	TACHED STATEME	ENT						
15	Describe the quantitat	tive offect of the orac	nizati	ional activ	on on the basis of the co	ourity in th	he hands of a U.S. taxpayer as an adjustment per		
15		-				curity in ti	ne hands of a 0.5. taxpayer as an adjustment per		
	share or as a percenta		EEA	TACHE					
16	Describe the calculation of the change in basis and the data that supports the calculation					culation,	such as the market values of securities and the		
	valuation dates > SE	E ATTACHED STAT		NT					

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Par	t II	Organizational Action (contin	nued)			
17		applicable Internal Revenue Code se		n the tax treatment is ba	ased I.R.C. SECTIONS 305 & 307	
18	Caplan	y resulting loss be recognized? ► N	/Δ			
10	Can an					
19	Provide	e any other information necessary to i	mplement the adjustment, such as the	e reportable tax year 🕨	N/A	
	Und	er penalties of perjury, I declare that I have	e examined this return, including accompa	nying schedules and state	ments, and to the best of my knowledge and	
Sign		f, it is true, correct, and complete. Declara	tion of preparer (other than officer) is based	on all information of which	i preparer has any knowledge.	
Here		/s/ Ross A. Teune	Date ► 5/2	Date > 5/7/2020		
		your name ► ROSS A. TEUNE Print/Type preparer's name	Preparer's signature	Data		
Paic			Wally E. Ren	5-7-2020	Check if self-employed PTIN	
	parer Only	Firm's name F KPMG LLP		1	Firm's EIN ► 13-5565207	
	y	Firm's address ► 200 EAST RAND	OLPH STREET, SUITE 5500, CHICA	GO, IL 60601	Phone no. 312-665-1000	

 Ose Only
 Hind Life

 Firm's address ► 200 EAST RANDOLPH STREET, SUITE 5500, CHICAGO, IL 60601
 Phone no.
 312-4

 Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054
 84201-0054

IRS FORM 8937 (REPORT OF ORGANIZATIONAL ACTIONS AFFECTING BASIS OF SECURITIES)

Attachments for Golub Capital BDC, Inc. May 7, 2020

Part II

14.

On April 8, 2020, Golub Capital BDC, Inc. ("GBDC", "Company", "we", or "us") commenced a rights offering to raise proceeds of up to \$375,330,340 (the "rights offering"). Pursuant to the rights offering, each stockholder of the Company received one transferable subscription right ("right") for each four outstanding shares of common stock held as of 5:00 p.m., Eastern Time, on April 8, 2020 (the "record date"). Each right entitled the holder to purchase one share of our common stock (the "subscription right"). Rights holders who fully exercised their basic subscription rights were entitled to subscribe for additional shares of the Company's common stock that remained unsubscribed as a result of any unexercised basic subscription rights (the "oversubscription right"). The rights offering expired at 5:00 p.m., Eastern Time, on May 6, 2020.

15.

The U.S. federal income tax treatment of the receipt of a right by a stockholder is subject to uncertainty. While not free from doubt, GBDC is taking the position that the receipt of a right is not treated as a taxable distribution for U.S. federal income tax purposes. GBDC is taking the position that the fair market value of each right on the date of receipt is less than 15 percent of the aggregate fair market value of the stockholder's existing shares of GBDC common stock. Accordingly, absent a U.S. federal income tax election under I.R.C. § 307(b) and Treas. Reg.§ 1.307-1 to allocate basis by a stockholder, the rights should be allocated a zero basis for U.S. federal income tax purposes. GBDC stockholders should read the U.S. federal income tax discussion in the Prospectus Supplement for the rights offering under "Federal Income Tax Consequences of the Offer", and consult their tax advisors, in light of their particular circumstances, regarding the U.S. federal income tax consequences of the rights offering. Responses 16-19 of this IRS Form 8937 assumes that a stockholder has not made the election under I.R.C. § 307(b) and Treas. Reg.§ 1.307-1.

16.

GBDC has determined that the fair market value of the rights is less than 15 percent of the aggregate fair market value of the shares of GBDC common stock to which it was distributed and, accordingly, absent an election by a shareholder, the basis of the rights is zero and no change in basis calculation is necessary.