

Attachment to IRS Form 8937

U.S Federal Income Tax Information Relating to Biogen Inc.'s Distribution of Bioverativ Inc.'s Common Stock on February 1, 2017

General Information Only

The following information provides a general summary regarding the application of certain provisions of the U.S. Internal Revenue Code of 1986, as amended, and the Treasury regulations promulgated thereunder, with respect to the allocation of tax basis among a Biogen shareholder's shares of Biogen common stock and shares of Bioverativ common stock following the Distribution. This information 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. Neither Biogen nor Bioverativ provides tax advice to its shareholders. Each shareholder should consult his or her own tax advisor as to the tax consequences of the Distribution under U.S. federal, state, local and foreign tax laws. The example below is provided solely for illustrative purposes and as a convenience to Biogen and Bioverativ shareholders and their own tax advisors when establishing their specific tax positions. We urge you to read the information statement attached as Exhibit 99.1 to the amended registration statement on Form 10 of Bioverativ, as filed with the Securities and Exchange Commission on November 29, 2016, noting especially the discussion under the heading "U.S. Federal Income Tax Consequences."

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:

On February 1, 2017, Biogen, pursuant to the terms and conditions of a Separation Agreement dated January 31, 2017, by and between Biogen and Bioverativ, distributed 100% of the outstanding shares of common stock of Bioverativ to the holders of record of Biogen common stock (each a "Biogen Shareholder"). Each Biogen Shareholder received one share of Bioverativ common stock for every two shares of Biogen common stock held by such shareholder (the "Distribution"). Biogen Shareholders also received cash in lieu of any fractional shares of Bioverativ common stock resulting from the Distribution.

15. Describe the quantitative effect of the organization 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.

As a result of the Distribution, Biogen Shareholders will be required to allocate the aggregate tax basis in their shares of Biogen common stock held immediately before

the Distribution among the shares of Bioverativ common stock received in the Distribution (including any fractional share interest in Bioverativ common stock for which cash was received) and their Biogen common shares held immediately after the Distribution. A Biogen Shareholder's aggregate tax basis in his or her shares of Biogen common stock held immediately prior to the Distribution should be allocated in proportion to the relative fair market value of his or her Biogen common stock and the Bioverativ common stock at the time of the Distribution. Shareholders who acquired the Biogen common stock at different times or different prices will need to calculate their tax basis in each block of stock and then allocate a portion of that tax basis of the Biogen common stock and the Bioverativ common stock received with respect thereto.

There is no direct guidance under U.S. federal income tax law as to the proper approach or method for determining the fair market value of shares of stock for purposes of such tax basis allocation. In general, for U.S. federal income tax purposes, fair market value is the price at which property would change hands between a willing buyer and a willing seller, neither being under any compulsion to buy or to sell and both having reasonable knowledge of the facts. Shareholders should consult their tax advisors to determine what measure of fair market value is appropriate.

There are several possible methods for determining the fair market value of Biogen common stock and Bioverativ common stock. One possible approach is to utilize the NASDAQ volume-weighted average price on the first day of "regular way" trading following the Distribution on February 2, 2017 for both Biogen common stock, which was \$262.8560 per share, and Bioverativ common stock, which was \$44.2557 per share. Based on such values and the distribution ratio of one share of Bioverativ common stock for every two shares of Biogen common stock in the Distribution, approximately 92.24% of a Biogen Shareholder's aggregate tax basis in his or her shares of Biogen common stock prior to the Distribution should be allocated to such Biogen Shareholder's shares of Biogen common stock and approximately 7.76% should be allocated to such Biogen Shareholder's share of Bioverativ stock (including any fractional share of Bioverativ common stock for which cash was received).

Shareholders should determine, in consultation with their own tax advisors, which approach to use to determine the fair market value of Biogen common shares and shares of Bioverativ common stock. Please note that this information is only provided as an example of one potential approach.

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:

The following is an example provided solely for illustrative purposes on how the basis allocation would be so applied:

Assumptions:

- Shares of Biogen common stock owned = 100
- Biogen Shareholder’s aggregate tax basis at \$200 per share = \$20,000
- Shares of Bioverativ common stock received in the Distribution = 50
 - 100 shares of Biogen common stock multiplied by the distribution ratio of 1:2

Tax basis allocation:

Common Stock	# Shares Owned	Assumed Beginning Basis (A)	Volume Weighted Average Price Feb 2	FMV of Shares Owned Post Distribution	Percentage of Total FMV (B)	Allocation Tax Basis = A x B
Biogen	100	\$20,000	\$262.8560	\$26,285.60	92.24%	\$18,447.08
Bioverativ	50		\$44.2557	\$2,212.79	7.76%	\$1,552.92
Total				\$28,498.39	100.00%	\$20,000.00

17. List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based.

Sections 355(a), 358(a)-(c) and 368(a)(1)(D).

18. Can any resulting loss be recognized?

Biogen Shareholders receiving cash in lieu of fractional shares could realize a loss. Generally such loss may be recognized. Otherwise Biogen Shareholders should not recognize gain or loss on their receipt of Bioverativ common stock.

19. Provide any other information necessary to implement the adjustment, such as the reportable tax year.

The tax basis allocation adjustments resulting from the Distribution are generally effective as of the date of the Distribution February 1, 2017. For a Biogen Shareholder whose taxable year is a calendar year, the reportable tax year is 2017.