Form **8937** (December 2011) Department of the Treasury Internal Revenue Service

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

OMB No. 1545-2224

Part I Reporting Issuer

1 Issuer's name: SPX Corporation		2 Issuer's employer identification number (EIN): 38-1016240
3 Name of contact for additional information: Investor Relations	4 Telephone No. of contact: (980) 474-3704	5 Email address of contact: investor@spx.com
6 Number and street (or P.O. box if mail is not delivered to street address) of contact: 13320-A Ballantyne Corporate Place		7 City, town, or post office, state, and Zip code of contact: Charlotte, NC 28277
8 Date of action: September 26, 2015	9 Classification and description: Distribution of SPX FLOW, Inc. Common Stock	

10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)
78469X 107	N/A	FLOW	N/A

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 ▶

Please see attached statement

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 ▶

Please see attached statement

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 ▶

Please see attached statement

Part II Organizational Action (continued)

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

Please see attached statement

18 Can any resulting loss be recognized? ▶

Please see attached statement

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

Please see attached statement

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 ▶ [signature] Date ▶ 10/2/15

Print your name ▶ Scott Sproule Title ▶ VP, Treasurer, + CFO

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check ☐ if self-employed	PTIN
	Firm's name ▶			Firm's EIN ▶	
	Firm's address ▶			Phone no.	

SPX Corporation
Attachment to Form 8937
Report of Organizational Actions Affecting Basis of Securities

<table>
<tr><th>Line</th><th>Information Requested</th><th>Response</th></tr>
<tr><td>Part II, Item 14</td><td>Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action.</td><td>On September 26, 2015, pursuant to the Separation and Distribution Agreement between SPX Corporation ("SPX") and SPX FLOW, Inc. ("FLOW"), SPX distributed to its shareholders 100% of the outstanding shares of FLOW (the "Distribution"). SPX Shareholders received one FLOW share for each share of SPX held at 5:00pm on the record date, September 16, 2015.

As a result of the Distribution, FLOW became an independent, publicly-traded company. The stock information is as follows:

SPX CUSIP Number: 784635104
Former Ticker Symbol: SPW (NYSE)
New Ticker Symbol: SPXC (NYSE)

FLOW CUSIP Number: 78469X 107
Ticker Symbol: FLOW (NYSE)</td></tr>
<tr><td>Part II, Item 15</td><td>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.</td><td>A shareholder's tax basis in a share of SPX with respect to which such shareholder received a share of FLOW in the Distribution must be allocated between such SPX share and such FLOW share based on their fair market values. As discussed in Item 16 below, under one possible approach to measuring fair market value, tax basis would be allocated 26.33% to the SPX share and 73.67% to the FLOW share.</td></tr>
<tr><td>Part II, Item 16</td><td>Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of the securities and the valuation dates.</td><td>In a distribution to which Section 355 applies, basis in shares of the distributing corporation must be allocated between shares of the distributing corporation and the controlled corporation based on their respective fair market values. As U.S. federal income tax law does not specify the manner in which to determine these fair market values, a number of different possible valuation methodologies exist.

The allocation of tax basis set forth in Item 15 above was determined based on the volume-weighted average trading price of all SPX and FLOW shares traded on September 28, 2015, as reported by Capital IQ and shown below:

<table><tr><th></th><th>Average Price</th><th>Allocation Ratio</th></tr><tr><td>SPX</td><td>$11.95</td><td>$11.95 / $45.38 = 26.33%</td></tr><tr><td>FLOW</td><td><u>$33.43</u></td><td>$33.43 / $45.38 = 73.67%</td></tr><tr><td>Total</td><td><u>$45.38</u></td><td></td></tr></table></td></tr>
</table>

		Shareholders are not required to use the methodology just described and should consult with their own tax advisors regarding the consequences of the Distribution to them.
Part II, Item 17	List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based.	Sections 355(a), 358(a), 358(b), 358(c).
Part II, Item 18	Can any resulting loss be recognized?	No.
Part II, Item 19	Provide any other information necessary to implement the adjustment, such as the reportable tax year.	The distribution of the FLOW common stock occurred in calendar year 2015.

Notes:

All Code Section references are to the Internal Revenue Code of 1986, as amended.

The information contained herein is a summary of the material U.S. federal income tax basis consequences of the Distribution under current law and is for general information only. It does not constitute tax advice and does not purport to be complete or to describe the consequences that may apply to particular types of shareholders. ***You are urged to consult with your own tax advisor regarding the particular tax consequences of the Distribution to you.***