



**Part II Organizational Action** *(continued)*

**17** List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ IRC SECTION 301(C)(2) AND SECTION 316.

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**18** Can any resulting loss be recognized? ▶ NO LOSS MAY BE RECOGNIZED.

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**19** Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ THE SHAREHOLDERS SHOULD REDUCE THEIR ADJUSTED TAX BASIS IN THEIR SHARES ON THE DATE INDICATED AND FOR THE AMOUNT OF THE DISTRIBUTIONS DESCRIBED ABOVE.

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**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 ▶  Date ▶ 5/15/2023

Print your name ▶ Adam M. Cohen Title ▶ Senior Vice President, Tax

<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶				Firm's EIN ▶
	Firm's address ▶				Phone no.

**FORM 8937  
SAFEHOLD INC.  
Attachment**

**PART II, LINE 15:**

**PER SHARE REDUCTION OF BASIS**

Common Shares:

<b>DISTRIBUTION DATE</b>	<b>AMOUNTS</b>
1/15/2023	0.1770000
3/30/2023	0.1770000