

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name SAFEHOLD INC.		2 Issuer's employer identification number (EIN) 30-0971238	
3 Name of contact for additional information Adam M. Cohen, Senior Vice President, Tax		4 Telephone No. of contact (212) 930-9404	5 Email address of contact acohen@safeholdinc.com
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 1114 AVENUE OF THE AMERICAS, FL 39		7 City, town, or post office, state, and ZIP code of contact NEW YORK, NY 10036	
8 Date of action MARCH 31, 2023		9 Classification and description COMMON STOCK	
10 CUSIP number 78645L100	11 Serial number(s)	12 Ticker symbol SAFE	13 Account number(s)

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 ▶ **ON MARCH 31, 2023, SAFEHOLD INC. MERGED WITH AND INTO ISTAR INC. (NYSE:STAR), WITH ISTAR INC. SURVIVING, PURSUANT TO THAT CERTAIN AGREEMENT AND PLAN OF MERGER DATED AUGUST 10, 2022 AND RELATED DOCUMENTS. SHAREHOLDERS OF SAFEHOLD INC. RECEIVED SHARES IN ISTAR INC. ON A 1:1 BASIS ON MARCH 31, 2023. NO CASH OR OTHER PROPERTY WAS FURNISHED IN THE MERGER. IMMEDIATELY THEREAFTER, ISTAR INC. CHANGED ITS NAME TO SAFEHOLD INC.**

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 ▶ **A SHAREHOLDER WHO RECEIVED A SHARE OF ISTAR INC. (NEW SAFEHOLD INC.) SHOULD CARRYOVER THEIR BASIS IN SHARES OF SAFEHOLD TO THEIR SHARES IN NEW SAFEHOLD INC. (FORMERLY ISTAR INC.) ON A 1:1 BASIS.**

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 ▶ **THERE IS NO CHANGE IN BASIS OF A SAFEHOLD SHAREHOLDER'S SHARES IN NEW SAFEHOLD AS THE BASIS CARRIED OVER IN A STAUTORY MERGER DESCRIBED IN SECTION 368(a)(1)(A).**

Part II Organizational Action *(continued)*

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ SECTIONS 368(a), 354(a), AND 358(a).

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

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ THE MERGER AND EXCHANGE OF SHARES OCCURED DURING THE 2023 TAXABLE YEAR FOR CALENDAR YEAR TAXPAYERS.

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 ▶ 05/15/2023

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

Paid Preparer Use Only	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.