

# Report of Organizational Actions Affecting Basis of Securities

► See separate instructions.

## Part I Reporting Issuer

1 Issuer's name InvenTrust Properties Corp.		2 Issuer's employer identification number (EIN) 34-2019608	
3 Name of contact for additional information Janet Cha	4 Telephone No. of contact 630-570-0709	5 Email address of contact janet.cha@inventrustproperties.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 3025 Highland Parkway, Suite 350		7 City, town, or post office, state, and ZIP code of contact Downers Grove, IL 60515	
8 Date of action 08/05/2021		9 Classification and description Common Stock	
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	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 ► [SEE ATTACHED](#)

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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 ► [SEE ATTACHED](#)

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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 ► [SEE ATTACHED](#)

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

**17** List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ [SEE ATTACHED](#)

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**18** Can any resulting loss be recognized? ▶ [SEE ATTACHED](#)

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**19** Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ [SEE ATTACHED](#)

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**C** 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.

**Sign Here** Signature ▶ SIGNATURE ON FILE Date ▶ 9/14/2021

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

**InvenTrust Properties Corp.**

**One for Ten Reverse Stock Split of Common Stock**

**Attachment to Form 8937**

**PLEASE CONSULT YOUR TAX ADVISOR**

**THE FOLLOWING DISCUSSION IS A SUMMARY OF MATERIAL U.S. FEDERAL INCOME TAX CONSEQUENCES OF THE REVERSE STOCK SPLIT UNDER CURRENT LAW AND IS FOR GENERAL INFORMATION ONLY. THE INFORMATION CONTAINED HEREIN DOES NOT CONSTITUTE TAX ADVICE AND DOES NOT PURPORT TO BE COMPLETED OR TO DESCRIBE THE CONSEQUENCES THAT MAY APPLY TO PARTICULAR CATEGORIES OF SHAREHOLDERS.**

**SHAREHOLDERS ARE URGED TO CONSULT THEIR OWN TAX ADVISOR WITH RESPECT TO THE U.S. FEDERAL, STATE AND LOCAL, AND FOREIGN TAX CONSEQUENCES OF THE REVERSE STOCK SPLIT.**

**Part II – Organizational Action**

**Line 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.**

At close of business on August 5, 2021, InvenTrust Properties Corp. ("Taxpayer") effected a 1-for-10 reverse stock split. As a result of the reverse stock split, every ten (10) shares of issue and outstanding common stock automatically converted into one (1) share of common stock, with any fractional shares being rounded up to the next higher whole share.

**Line 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.**

The reverse stock split is intended to qualify as a "reorganization" within the meaning of IRC Section 368(a)(1)(E). As a result, shareholders must allocate the aggregate tax basis in their shares held immediately prior to the reverse stock split among the shares held immediately after the reverse stock split (including any fractional shares).

**Line 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.**

See answer to Line 15. While the basis "per share" is impacted, the basis of the shareholder's total investment remains unchanged. The aggregate tax basis of the Taxpayer's common stock held by a shareholder immediately after the reverse stock split would be the same as pre-split aggregate tax basis.

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

IRC Sections 354,358, and 368.

**Line 18. Can any resulting loss be recognized?**

The 1-for-10 reverse split is intended to be treated as recapitalization for U.S. federal income tax purposes. Since no cash was received in lieu of a fractional share, a shareholder will not recognize any gain or loss for U.S. federal income tax purposes upon the combination of pre-reverse stock split shares into post-reverse stock split shares pursuant to the reverse stock split.

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

The reportable tax year in which the reverse stock split occurred is 2021.