

# Report of Organizational Actions Affecting Basis of Securities

OMB No. 1545-0123

► See separate instructions.

## Part I Reporting Issuer

1 Issuer's name <b>Hines Global REIT, Inc.</b>		2 Issuer's employer identification number (EIN) <b>26-3999995</b>	
3 Name of contact for additional information <b>Gordon Findlay</b>	4 Telephone No. of contact <b>888-220-6121</b>	5 Email address of contact <b>HinesInvestorRelations@hines.com</b>	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact <b>2800 Post Oak Blvd., Suite 5000</b>		7 City, town, or post office, state, and ZIP code of contact <b>Houston, TX 77056-6118</b>	
8 Date of action <b>See Below</b>		9 Classification and description <b>Common Stock</b>	
10 CUSIP number <b>433240108</b>	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 ► **The Taxpayer on June 30, 2020 entered into an Agreement and Declaration of Trust (the "Liquidating Trust Agreement") in connection with the formation of HGR Liquidating Trust. The purpose of the Trust is to complete the liquidation of assets according to the Plan of Liquidation approved on July 17, 2018. The Company transferred all of its assets and liabilities to the Trust and received units of beneficial interest in the Trust equal to the number of shares of the Company's common stock outstanding on June 30, 2020. Immediately thereafter, the Company distributed the Units pro rata to its stockholders such that one Unit was distributed for each share of the Company's common stock and all stockholders of the Company are now unitholders and beneficiaries of the Trust.**

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 Net Asset Value of the units as of June 30, 2020 was \$5.58 per unit.**

**The aggregate tax basis of the Units of HGR Liquidating Trust received by the shareholders of Hines Global REIT Inc. will be the same as the aggregate tax basis of the common shares of Hines Global REIT inc. surrendered in the exchange.**

**As a receipt of Units for shares and receipt of tax basis in the Units, the shareholders will be treated as having exchanged their shares for an undivided interest in the assets of the Trust (and the tax basis referring to that undivided interest as well).**

**The exchange ratio was 1 unit of HGR Liquidating Trust for every 1 share of Hines Global REIT Inc.**

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 ► **Unitholders will be treated as having sold their shares of common stock in a taxable transaction in exchange for units of the Trust and will be treated as recognizing taxable gain to the extent the value of those units exceeds the tax basis in their shares of the Company's common stock.**

**As a receipt of Units for shares and receipt of tax basis in the Units, the shareholders will be treated as having exchanged their shares for an undivided interest in the assets of the Trust (and the tax basis referring to that undivided interest as well).**

**Shareholders should contact their tax advisors regarding the specific circumstances surrounding their shares subject to this organizational action.**

**Part II Organizational Action** (continued)

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

Internal Revenue Code section 336(a) provides that gain (or loss) shall be recognized to a liquidating corporation on the distribution of property in complete liquidation as if property were sold to the distributee at its fair market value.

**18** Can any resulting loss be recognized? ► Yes

**19** Provide any other information necessary to implement the adjustment, such as the reportable tax year ► Short Period Tax Year 6/30/2020.  
These actions are effective on the date of distribution identified above.

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 ►

Date ►

Print your name ►

Title ► **Chief Accounting Officer and Treasurer**

**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.