

HGR Liquidating Trust – Frequently Asked Questions

Formerly Hines Global REIT, Inc. (HGR)

Portfolio

1. What's the status of the liquidation of the fund?

In 2022, HGR Liquidating Trust (the "Trust") sold the last remaining property. The winding down of the Liquidating Trust was completed and was dissolved as of December 7, 2022.

Distributions

2. What distributions have been paid or declared to date?

We have paid or declared aggregate distributions of \$15.14 per Unit to holders that have been invested since the inception of HGR. The following table provides more information with respect to distributions paid and payable to investors since inception:

Distributions per share/Unit	Description
\$ 5.64	Regular operating distributions paid from inception through June 2018
\$ 4.00	Special distributions paid in 2018 and 2019
\$ 1.00	Special distribution paid on July 31, 2020
\$ 2.45	Special distribution paid on September 24, 2020
\$ 0.80	Special distribution paid on September 29, 2021
\$ 0.60	Special distribution paid on January 14, 2022
\$ 0.62	Special distribution paid on March 22, 2022
\$ 0.03	Special distribution paid on October 20, 2022
<u>\$15.14</u>	

The amount of regular operating distributions received by each investor depends on when the investment was made and will be lower for those who invested after inception. Special distributions include liquidating distributions and other special distributions that are deemed a return of invested capital and reduce the investors' remaining investment in the company.

Tax Implications

3. How will the holders of Units of the Trust be taxed?

The Trust is intended to be treated as a "grantor trust" for U.S. federal income tax purposes. Accordingly, each Unit in the Trust will represent ownership of an undivided proportionate interest in all of the assets and liabilities of the Trust and holders will be treated, as receiving or paying directly a pro rata portion of all income, gain, loss deduction and credit of the Trust. The long-term or short-term character of any capital gain or loss recognized in connection with the sale of the Trust's assets will be determined based upon a holding period commencing on the Liquidation Date.

Although the Trust will not be treated as a partnership for U.S. federal income tax purposes, the tax consequences to unitholders generally will be similar to those that would be experienced if the Trust were a partnership. As is the case with a partnership, income derived from the Trust will only be taxed at the unitholder level, and the Trust itself will not be taxed (i.e., no “double taxation”). However, each unitholder will receive an itemized statement, in the form of a Schedule K-1 (or equivalent substitute, such as a grantor letter), that reports the unitholder’s allocable share of all of the various categories of revenues and expenses of the Trust.

4. **When will the 2022 tax documents be available?**

The Trust provided a detailed itemized statement that reports each unitholder’s allocable share of all of the various categories of revenue and expense of the Trust for the year. For the 2022 tax year, we expect to make the statement available on or around March 15th.

5. **How will UBTI be reported and what will the impact be on unitholders?**

The detailed itemized statement delivered at the beginning of each year for tax reporting purposes will include information as to the amount of any UBTI for the year.

As the Trust liquidated and sold all assets, the Trust did not recognize any UBTI in 2022.

6. **What is Qualified Business Income (QBI)?**

The QBI deduction generally allows taxpayers to deduct up to 20% of their QBI component. The deduction is generally limited to the lesser of the calculated QBI deduction or 20% of the taxpayer’s taxable income, calculated before the QBI deduction, minus taxpayer’s net capital gain.

Depending on the taxpayer’s taxable income, the QBI component may also be limited based on the type of trade or business, W-2 wages paid by that business, and Unadjusted Basis Immediately after Acquisition (UBIA) of qualified property held by the business. The information provided is intended to assist taxpayers with calculating their individual deductions and limitations on Form 8995 or 8995-A depending on their individual taxable income situation.

For tax-year 2022, taxpayers with taxable income before the qualified business deduction above \$170,050 (\$340,100 if married filing jointly) should generally utilize Form 8995-A. All taxpayers below these thresholds should generally utilize Form 8995.

Individual tax situations may vary, please consult your tax advisor.