

## Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

**Part I Reporting Issuer**

<b>1</b> Issuer's name		<b>2</b> Issuer's employer identification number (EIN)	
WASHINGTON PRIME GROUP, INC.		46-4323686	
<b>3</b> Name of contact for additional information	<b>4</b> Telephone No. of contact	<b>5</b> Email address of contact	
JOHN MILLS	614-621-9000	JOHN.MILLS@WASHINGTONPRIME.COM	
<b>6</b> Number and street (or P.O. box if mail is not delivered to street address) of contact		<b>7</b> City, town, or post office, state, and ZIP code of contact	
180 EAST BROAD ST., FL 21		COLUMBUS, OH, 43215	
<b>8</b> Date of action		<b>9</b> Classification and description	
DECEMBER 22, 2020		COMMON STOCK REVERSE SPLIT	
<b>10</b> CUSIP number	<b>11</b> Serial number(s)	<b>12</b> Ticker symbol	<b>13</b> Account number(s)
93964W405		WPG	

**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 DECEMBER 22, 2020, WASHINGTON PRIME GROUP INC. COMPLETED A 1 FOR 9 REVERSE STOCK SPLIT. FRACTIONAL SHARES WERE NOT REDEEMED, AND INSTEAD WERE ROUNDED UP TO THE NEAREST WHOLE COMMON SHARE.

THE CUSIP NUMBER FOR WASHINGTON PRIME GROUP INC WAS CHANGED FROM 93964W108 TO 93964W405. THE TICKER SYMBOL DID NOT CHANGE.

**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 ▶ UPON EFFECTIVENESS OF THE 1 FOR 9 REVERSE STOCK SPLIT, EACH SHAREHOLDER OF WASHINGTON PRIME GROUP INC. COMMON STOCK RECEIVED 1 NEW SHARE FOR EACH 9 OLD SHARES SURRENDERED.

NO FRACTIONAL SHARES WERE ISSUED OR REDEEMED IN THE REVERSE STOCK SPLIT. INSTEAD, FRACTIONAL SHARES WERE ROUNDED UP TO THE NEAREST WHOLE COMMON SHARE.

**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 ▶ IN GENERAL, THE AGGREGATE BASIS OF THE NEW WASHINGTON PRIME GROUP INC. COMMON SHARES RECEIVED IN THE REVERSE STOCK SPLIT IS EQUAL TO THE AGGREGATE BASIS OF THE WASHINGTON PRIME GROUP INC. SHARES SURRENDERED IN THE REVERSE STOCK SPLIT (THE "CARRYOVER BASIS").

THE CARRYOVER BASIS MUST BE ALLOCATED TO THE NEW SHARES RECEIVED (OR ALLOCABLE PORTIONS THEREOF) IN A MANNER THAT REFLECTS, TO THE GREATEST EXTENT POSSIBLE, THE BASIS IN THE OLD SHARES THAT WERE ACQUIRED ON THE SAME DATE AND AT THE SAME PRICE. TO THE EXTENT IT IS NOT POSSIBLE TO ALLOCATE THE CARRYOVER BASIS IN THIS MANNER, THE CARRYOVER BASIS MUST BE ALLOCATED TO THE NEW SHARES IN A MANNER THAT MINIMIZES THE DISPARITY IN THE HOLDING PERIODS OF THE OLD SHARES WHOSE COST BASIS IS ALLOCABLE TO ANY PARTICULAR NEW SHARE RECEIVED. THIS MAY CAUSE A NEW SHARE TO HAVE A SPLIT BASIS AND SPLIT HOLDING PERIOD.

**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), 302, 356, 358, AND 368(a)

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**18** Can any resulting loss be recognized? ▶ NO LOSS CAN BE RECOGNIZED UPON THE REVERSE STOCK SPLIT OF WASHINGTON PRIME GROUP INC. COMMON STOCK.

SHAREHOLDERS SHOULD CONSULT THEIR OWN TAX ADVISOR TO DETERMINE THE TAX IMPACT OF THIS TRANSACTION WITH RESPECT TO INDIVIDUAL FACTS AND CIRCUMSTANCES.

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**19** Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ THE ADJUSTMENT TO BASIS WOULD BE TAKE INTO ACCOUNT THE TAX YEAR OF THE SHAREHOLDERS DURING WHICH THE REVERSE STOCK SPLIT WAS EFFECTIVE (E.G. 2020 FOR CALENDAR YEAR TAXPAYERS).

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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 ▶ 2/5/21

Print your name ▶ MARK YALE Title ▶ EVP & CFO

<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.