

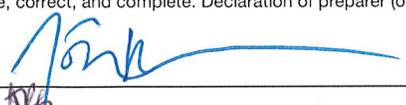
Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ Internal Revenue Code section 331(a) provides that the amount received by a shareholder in a distribution in complete liquidation shall be treated as in full payment in exchange for stock.

18 Can any resulting loss be recognized? ▶ This is the final liquidating distribution. If the the cash liquidation distribution does not exceed the cost basis, a loss can be recognized.

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

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ 2018
These actions are effective on the dates of distribution identified above.

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 ▶ 1/15/19		
Paid Preparer Use Only	Print your name ▶ J. Shea Morgenroth	Title ▶ Chief Accounting Officer and Treasurer		
	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed PTIN
	Firm's name ▶	Firm's EIN ▶		Phone no.
	Firm's address ▶			

Hines Real Estate Investment Trust, Inc.
EIN: 20-0138854
Form 8937

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Part II, Question 15. Describe the quantitative effect of the organization or 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 liquidating distribution reduced the basis of the security as follows:

Liquidation Distribution			
<u>Record Date</u>	<u>Distribution Payable Date</u>	<u>Distributions per share</u>	
7/9/2018	7/27/2018	\$	0.08