

**GRANTOR TAX INFORMATION LETTER**

TAX YEAR BEGING: JUNE 2, 2025  
TAX YEAR ENDING: SEPTEMBER 30, 2025

<p>NAME OF TRUST:</p> <p>EQC LIQUIDATING TRUST 2 NORTH RIVERSIDE PLAZA SUITE 1400 CHICAGO, IL 60606</p> <p>EMPLOYER ID NUMBER: 39-6868408</p>
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THE FOLLOWING INCOME, DEDUCTIONS AND CREDITS ARE TO BE REPORTED ON THE FEDERAL INCOME TAX RETURN OF EACH EQC LIQUIDATING TRUST GRANTOR, IF REQUIRED.

<b>FEDERAL INFORMATION</b>	
<b>INCOME</b>	
INTEREST INCOME.....	\$0.00524 per share
SHORT-TERM CAPITAL GAIN/(LOSS).....	(\$0.46080) per share
<b>OTHER INFORMATION</b>	
DISTRIBUTIONS.....	NONE
YOUR SHARE OF ITEMS OF INCOME, EXPENSE, GAIN AND LOSS REPORTED ON THIS GRANTOR LETTER IN CONNECTION WITH THE ACTIVITY OF THE TRUST MAY ALSO BE NEEDED FOR PURPOSES OF CALCULATING THE NET INVESTMENT INCOME TAX (IRC SEC. 1411). THE TRUST HAS NOT DETERMINED WHETHER YOU ARE SUBJECT TO THE NET INVESTMENT INCOME TAX AS THIS IS DETERMINED AT THE GRANTOR LEVEL. PLEASE CONSULT YOUR TAX ADVISOR.	
<b>STATE INCOME TAX INFORMATION</b>	
THE EQC LIQUIDATING TRUST'S COMMERCIAL DOMICILE IS IN THE STATE OF ILLINOIS. PLEASE CONSULT YOUR TAX ADVISOR REGARDING STATE TAX REPORTING REQUIREMENTS.	

To the beneficiaries of EQC Liquidating Trust,

The grantor letter on page 1 concerns the income, deductions and credits of EQC Liquidating Trust. In addition to the grantor letter for EQC Liquidating Trust on page 1, the following pages enclosed as a courtesy are the 2025 forms 8937 for Equity Commonwealth. The forms 8937 disclose information about Equity Commonwealth's 2025 distributions. Equity Commonwealth's 2025 distributions were paid to its shareholders of record prior to the transfer of its assets and liabilities to EQC Liquidating Trust.

The information contained in this disclosure is not tax advice. The holders of EQC Liquidating Trust units should consult their tax advisor to determine any tax consequences applicable to them (including the application and effect of any state, local or non-U.S. income and other tax laws).

## 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)	
Equity Commonwealth		04-6558834	
<b>3</b> Name of contact for additional information	<b>4</b> Telephone No. of contact	<b>5</b> Email address of contact	
Investor Relations	312-646-2801	ir@eqcre.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	
2 North Riverside Plaza Suite 2000		Chicago, IL 60606	
<b>8</b> Date of action		<b>9</b> Classification and description	
June 13, 2025		Distribution of Liquidating Trust Units	
<b>10</b> CUSIP number	<b>11</b> Serial number(s)	<b>12</b> Ticker symbol	<b>13</b> Account number(s)
294628102		EQC	

**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 November 12, 2024, Equity Commonwealth ("EQC") held a special meeting where the EQC shareholders approved a Plan of Sale and Dissolution (the "Plan of Sale") of EQC, including the wind-down and complete liquidation of EQC.  
On June 13, 2025, EQC transferred its remaining assets and liabilities to EQC Liquidating Trust ("EQC LT") for the benefit of EQC's common shareholders. In conjunction with the transfer, EQC LT distributed all its units of beneficial interest to EQC's common shareholders, with each common shareholder receiving one unit in EQC LT (the "Units") for each common share held. This action brings the aggregate liquidating distributions to \$21.06 per common share, inclusive of cash liquidating distributions of \$19.00 and \$1.60 per share paid in December 2024 and April 2025, respectively. The purpose of EQC LT is to wind up the affairs of EQC, liquidate any remaining assets, pay any liabilities, costs and expenses, and distribute any net proceeds to the holders of the Units.

**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 transfer of EQC's net assets to EQC LT is treated for federal tax purposes as a deemed distribution to EQC's common shareholders. The amount of the deemed distribution is \$0.46 per common share and will be applied first to reduce a U.S. holder's tax basis in its common shares, but not below zero. To the extent that distributions pursuant to the Plan of Sale exceed a U.S. holder's basis in its common shares, the excess will constitute taxable gain and be recognized in the year the distribution is received. If the total amount of liquidating distributions received by a U.S. holder is less than the tax basis of its shares, the U.S. holder will generally recognize a loss in the year that includes June 13, 2025. This \$0.46 per share deemed distribution is the final EQC liquidating distribution. Holders of EQC LT Units have a tax basis of \$0.46 per Unit.

**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 ▶ Liquidating distributions are applied against and reduce the adjusted basis of a U.S. holder's common shares. EQC LT holds \$0.46 per Unit of cash minus liabilities.

**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 331, IRC Section 336 and IRC Section 346(a).

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**18** Can any resulting loss be recognized? ▶ \_\_\_\_\_  
If the total amount of liquidating distributions received by a U.S. holder is less than the tax basis of its shares, the U.S. holder will generally recognize a loss in the year that includes June 13, 2025.

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**19** Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ Not applicable.

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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 ▶ /s/ William Griffiths Date ▶ 7/23/2025

<b>Paid Preparer Use Only</b>	Print your name ▶ <u>William Griffiths</u>	Preparer's signature ▶ <u>/s/ Neal Lewis</u>		Date ▶ <u>7/23/2025</u>	Check <input type="checkbox"/> if self-employed	PTIN <u>P00227417</u>
	Print/Type preparer's name <u>Neal Lewis</u>	Preparer's signature <u>/s/ Neal Lewis</u>		Date <u>7/23/2025</u>	Check <input type="checkbox"/> if self-employed	PTIN <u>P00227417</u>
	Firm's name ▶ <u>Deloitte Tax LLP</u>	Firm's address ▶ <u>111 Monument Circle Indianapolis, IN 46204</u>		Firm's EIN ▶ <u>86-1065772</u>	Phone no. <u>317-378-8442</u>	
	Firm's address ▶ <u>111 Monument Circle Indianapolis, IN 46204</u>			Firm's EIN ▶ <u>86-1065772</u>	Phone no. <u>317-378-8442</u>	



**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 331, IRC Section 336 and IRC Section 346\(a\)](#)

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**18** Can any resulting loss be recognized? ▶ \_\_\_\_\_  
[If the total amount of liquidating distributions received by a U.S. holder is less than the tax basis of its shares, the U.S. holder will generally recognize a loss in the year the final liquidating distribution is received.](#)

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**19** Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ [Not Applicable](#)

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**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 ▶ /s/ William Griffiths Date ▶ 5/28/2025

Print your name ▶ William Griffiths Title ▶ EVP CFO Treasurer

<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	<u>Neal Lewis</u>	<u>/s/ Neal Lewis</u>	<u>5/21/2025</u>		<u>P00227417</u>
	Firm's name ▶ <u>Deloitte Tax LLP</u>	Firm's EIN ▶ <u>86-1065772</u>		Phone no. <u>317-378-8442</u>	
	Firm's address ▶ <u>111 Monument Circle Indianapolis, IN 46204</u>				