

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name		2 Issuer's employer identification number (EIN)	
Safety, Income & Growth Inc.		30-0971238	
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact	
Adam M. Cohen, SVP Tax	212-930-9404	acohen@istar.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact		7 City, town, or post office, state, and ZIP code of contact	
1114 Avenue of the Americas, 39th Floor		New York, NY 10036	
8 Date of action		9 Classification and description	
9/19/17		Nontaxable Distribution to Shareholders	
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)
78649D104	N/A	SAFE	

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 made a cash distribution in excess of its current and accumulated earnings and profits. The cash distribution was made on the date listed below and shareholders must determine their basis on such date against which such distribution should be applied.

October 16, 2017

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 distribution reduced the basis of the securities in the hands of the U.S. taxpayer as follows:

October 16, 2017 -- Basis reduced \$0.1566 per 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 ▶ The taxpayer's earnings and profits were calculated under IRC §857(d), and the regulations thereunder, for a Real Estate Investment Trust (REIT). Amounts distributed by the REIT in excess of its earnings and profits reduce, but not below zero, the shareholders' tax basis in their shares.

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 §301(c)(2)

18 Can any resulting loss be recognized? ▶ No

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The shareholders should reduce their adjusted tax basis in their shares on the date indicated and for the amount of the distribution described 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 ▶ 1/18/2018

Print your name ▶ Adam M. Cohen Title ▶ SVP, Tax

Paid Preparer Use Only	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.	