

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ See attachment.

18 Can any resulting loss be recognized? ▶ See attachment.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ See attachment.

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 ▶ JAN 15 2019

Print your name ▶ Jeff Leer Title ▶ CFO/Treasurer

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.	

Select Income REIT
Return of Capital Distributions/Distribution of Industrial Logistics Properties Trust Common
Shares to Select Income REIT Shareholders/Exchange of Select Income REIT Common Shares
for Government Properties Income Trust Common Shares
Attachment to Form 997

Part I

Line 8. Date of action

February 22, 2018
May 17, 2018
August 16, 2018
November 15, 2018
December 27, 2018
December 31, 2018

Part II

Line 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 February 22, 2018, May 17, 2018, August 16, 2018, and November 15, 2018, Select Income REIT ("SIR") made cash distributions to its common shareholders in excess of its current and accumulated earnings and profits.

On September 17, 2018, SIR, Government Properties Income Trust ("GOV"), and GOV's wholly owned subsidiary, GOV MS REIT ("GOV Merger Sub"), entered into an Agreement and Plan of Merger (the "Merger Agreement") to effectuate an all-stock merger whereby SIR agreed to merge with and into GOV Merger Sub such that GOV Merger Sub continue as the surviving entity (the "Merger"). As a condition to closing the Merger, SIR agreed to distribute pro rata to its shareholders the 45,000,000 common shares of Industrial Logistics Properties Trust owned by SIR (the "ILPT Distribution"). SIR completed the ILPT Distribution on December 27, 2018.

On December 31, 2018 (the "Exchange Date"), the Merger was completed. Pursuant to the Merger Agreement, each issued and outstanding SIR common share was converted into the right to receive one and four-hundredths (1.04) GOV common shares, with cash paid in lieu of fractional GOV common shares (the exchange of SIR common shares for GOV common shares is hereinafter referred to as the "Exchange"). Immediately following the completion of the Merger, GOV effected a reverse stock split (the "Reverse Split") of the common shares of the combined company, pursuant to which every four common shares of the combined company were converted into one common share of the combined company, with cash paid in lieu of fractional common shares of the combined company.

Shareholders are urged to refer to the joint proxy statement/prospectus filed by SIR with the SEC on November 16, 2018 under the caption “*Material United States Federal Income Tax Considerations*” and to consult with their own tax advisors regarding the consequences of the ILPT Distribution, the Exchange, and the Reverse Split, including the applicability and effect of all U.S. federal, state and local, and foreign tax laws.

Line 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 ILPT Distribution is treated as a distribution by SIR to its shareholders in the amount of the fair market value of the ILPT common shares distributed, which has been consistently reported as \$19.50 per ILPT common share. As the value of SIR’s total cash and other distributions for SIR’s 2018 taxable year exceeded its current and accumulated earnings and profits in the same taxable year, a portion of each distribution (including the ILPT Distribution) is treated as a return of capital that reduced each shareholder’s adjusted tax basis in its SIR common shares, to the extent that such distributions do not exceed that shareholder’s adjusted basis in such SIR common shares. The per-share reduction of each shareholder’s basis in SIR common shares is as follows:

Payment Date	Reduction in Basis
2/22/2018	\$0.2900
5/17/2018	\$0.2900
8/16/2018	\$0.2900
11/15/2018	\$0.2900
12/27/2018	\$5.5720

The Merger was intended to qualify as a “reorganization” within the meaning of Section 368(a) of the Internal Revenue Code of 1986, as amended (the “Code”).

The aggregate tax basis of the GOV common shares received in the Merger (including fractional GOV common shares settled in cash) by a SIR shareholder should be the same as the aggregate tax basis of the SIR common shares surrendered in exchange therefor. SIR shareholders that acquired SIR common shares at different times or at different prices must allocate such adjusted tax basis with respect to each block of SIR common shares surrendered.

The Reverse Split was intended to qualify as a “reorganization” within the meaning of Section 368(a) of the Code.

The aggregate tax basis of the GOV common shares received in the Reverse Split (including fractional GOV common shares settled in cash) should be equal to the

aggregate tax basis of the GOV common shares exchanged therefor. SIR shareholders that acquired SIR common shares at different times or at different prices must allocate such adjusted tax basis with respect to each block of GOV common shares surrendered.

A SIR shareholder who received cash in lieu of a fractional GOV common share in the Merger or the Reverse Split should generally be treated as having received a fractional GOV common share in the Merger or the Reverse Split, as applicable, and then having sold such fractional share for cash.

Line 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.

SIR's earnings and profits for purposes of calculating the per-share reduction in basis were computed in accordance with Section 312 of the Code (as modified by Section 857(d) for a real estate investment trust) and the regulations thereunder. Amounts in excess of earnings and profits reduce a shareholder's tax basis in its SIR common shares to the extent of the shareholder's basis in those shares.

The adjusted tax basis of each SIR common share surrendered in the Merger should be allocated to the GOV common shares (including fractional GOV common shares settled in cash) received in exchange therefor. SIR shareholders that acquired SIR common shares at different times or at different prices must allocate such adjusted tax basis with respect to each block of SIR common shares surrendered.

The aggregate tax basis of the GOV common shares received by a shareholder in the Reverse Split (including fractional GOV common shares settled in cash) should be equal to the aggregate tax basis of the GOV common shares exchanged therefor. SIR shareholders that acquired SIR common shares at different times or at different prices must allocate such adjusted tax basis with respect to each block of GOV common shares surrendered.

Shareholders should consult their own tax advisors regarding the appropriate method for determining their specific tax treatment of all distributions, the Exchange, and the Reverse Split (including but not limited to the computation of gain and tax basis).

Line 17. List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based.

Section 301(c)(2) is the applicable Code section upon which the tax treatment of the amounts distributed by SIR (including the ILPT Distribution) is based.

Sections 354, 358(a), 361, 368(a), 1001, 1221, and 1223 are the applicable Code sections upon which the tax treatment of the Exchange and Reverse Split are based.

Line 18. Can any resulting loss be recognized?

With respect to the amounts distributed by SIR (including the ILPT Distribution), no resulting loss can be recognized.

SIR shareholders generally cannot recognize any loss upon receipt of the GOV common shares in the Exchange or the Reverse Split (except for loss, if any, recognized by a SIR shareholder who received cash in lieu of fractional shares).

Line 19. Provide any other information necessary to implement the adjustment, such as the reportable tax year.

The basis adjustments for the amounts distributed by SIR (including the ILPT Distribution) are taken into account in the tax year of a SIR shareholder which includes the distribution dates identified above (e.g., 2018 for calendar year taxpayers).

The basis adjustments resulting from the Merger, the Exchange, and the Reverse Split are taken into account in the tax year of a SIR shareholder during which the Merger and Reverse Split occurred (e.g., 2018 for calendar year taxpayers).