

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 316 (a) AND 301 (c) (2) .

18 Can any resulting loss be recognized? ▶ _____
FOR U.S. FEDERAL INCOME TAX PURPOSES, THE DISTRIBUTIONS WILL NOT RESULT IN ANY TAX LOSS FOR ANY COMMON UNITHOLDERS.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ _____
SEE ATTACHED STATEMENT.

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 ▶ J.A. Costain Date ▶ 8th February 2019

Print your name ▶ John Andrew Costain Title ▶ Chief Executive Officer

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	SUSAN MCKILLIGAN				P01491547
	Firm's name ▶ PRICEWATERHOUSECOOPERS LLP	Firm's EIN ▶ 98-0189320		Phone no. 604-806-7000	
	Firm's address ▶ #1400-250 HOWE STREET, VANCOUVER, BC CANADA V6C3S7				

Attachment to Form 997
Report of Organizational Actions Affecting Basis of Securities

Issuer: KNOT Offshore Partners LP
EIN: 98-1098373

Part I, Item 9 Common Units
Item 10 CUSIP # - Y48125101
Item 12 Ticker Symbol - KNOP

Part II, Item 14 During the year ended December 31, 2018, KNOT Offshore Partners LP ("KNOP") declared the following cash distributions to the common unitholders on the dates of record:

	Date of Record	Amount per Unit	Date Paid
Common Units	February 2, 2018	\$0.5200	February 15, 2018
	May 2, 2018	\$0.5200	May 15, 2018
	August 1, 2018	\$0.5200	August 14, 2018
	November 1, 2018	\$0.5200	November 14, 2018

Part II, Item 15 Dividends paid in excess of the current and accumulated earnings and profits of a corporation reduce the basis of the shares of the corporation pursuant to Internal Revenue Code §301(c)(2) and §316(a).

Based on the current and accumulated earnings and profits of KNOP, a portion of the distributions paid per unit as of the dates of record should reduce the basis of each common unitholder as follows:

Common Units	\$0.29967 per common unit for holders on February 2, 2018
	\$0.29967 per common unit for holders on May 2, 2018
	\$0.29967 per common unit for holders on August 1, 2018
	\$0.29967 per common unit for holders on November 1, 2018

Part II, Item 19 The reportable tax year is 2018. Unitholders as of the following dates of record should reduce the basis of each unit held on those dates by the following amounts per unit:

Common Units	\$0.29967 per common unit for holders on February 2, 2018
	\$0.29967 per common unit for holders on May 2, 2018
	\$0.29967 per common unit for holders on August 1, 2018
	\$0.29967 per common unit for holders on November 1, 2018

The reduction in basis is cumulative such that a unitholder who was the unitholder of record for all four distributions would be required to reduce its basis by a total of \$1.19868 per unit.
