

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)	
Babcock & Wilcox Enterprises, Inc.		47-2783641	
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact	
Megan Wilson	704-625-4944	investors@babcock.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	
1200 East Market Street, Suite 650		Akron, OH 44305	
8 Date of action	9 Classification and description		
June 30, 2021	Distribution on preferred stock		
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)
05614L407		BW PRA	

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 June 8, 2021, Babcock & Wilcox Enterprises, Inc. ("BWE") declared a distribution of \$0.290625 per share of its outstanding 7.75% Series A Cumulative Perpetual Preferred Stock, with a record date for the distribution of June 18, 2021. Payment of the distribution occurred on June 30, 2021.

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 will be treated as a nontaxable return of capital to the extent of the shareholders' tax basis. Tax basis in the preferred shares will be reduced by the amount of the nontaxable portion of the distribution. Any amount in excess of a shareholder's basis will be treated as gain for U.S. federal income tax purposes. Shareholders should consult their own tax advisors to determine the income tax consequences of their specific situation.

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 taxability of the distribution is based on BWE's earnings and profits as computed for U.S. federal income tax purposes. BWE's calculation of estimated current and accumulated earnings and profits ("E&P") for the 2021 distributions resulted in an E&P deficit. This supports the characterization of the distribution as a nontaxable return of capital to the extent of the shareholders' tax basis.

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 301\(c\)](#)

[Internal Revenue Code Section 316\(a\)](#)

18 Can any resulting loss be recognized? ▶ [No loss can be recognized as a result of the distribution.](#)

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ [Reportable tax year is 2021.](#)

[BWE is providing this Form for information purposes only and not as legal or tax advice. Shareholders should consult their own tax advisors to determine the income tax consequences of their specific situation.](#)

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 ▶ Susan M Craven Date ▶ 08/06/2021

Print your name ▶ Susan M Craven Title ▶ Vice President, 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.