

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)	
NORTHSTAR REALTY EUROPE CORP.		32-0468861	
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact	
GORDON SIMPSON	855-527-8539	NRE@FINSBURY.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	
590 MADISON AVENUE, 34FL		NEW YORK, NY 10022	
8 Date of action		9 Classification and description	
SEE LINE 15		COMMON STOCK DIVIDENDS	
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)
SEE ATTACHED		NRE ON NYSE	

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 CASH DISTRIBUTIONS TO ITS SHAREHOLDERS FROM ITS CURRENT AND ACCUMULATED EARNINGS AND PROFITS. SEE PART II, LINE 15 FOR THE AMOUNT OF THESE DISTRIBUTIONS.

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 DISTRIBUTIONS REDUCED THE BASIS OF THE SECURITIES IN THE HANDS OF THE U.S. TAXPAYERS AS MENTIONED IN THE ATTACHED STATEMENT.

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 EARNINGS AND PROFITS WERE CALCULATED UNDER IRC SECTION 312, AS MENTIONED BY THE IRC SECTION 857(D) FOR A REAL ESTATE INVESTMENT TRUST, AND THE REGULATIONS THEREUNDER. AMOUNTS IN EXCESS OF EARNINGS AND PROFITS REDUCE THE SHAREHOLDER'S TAX BASIS IN ITS SHARES TO THE EXTENT OF 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 ▶ IRC SECTION 301(C)(2)

Blank lines for listing applicable Internal Revenue Code sections.

18 Can any resulting loss be recognized? ▶ NO

Blank lines for providing information regarding resulting loss recognition.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ THESE ACTIONS ARE EFFECTIVE ON THE DATE OF THE DISTRIBUTIONS IDENTIFIED ABOVE.

Blank lines for providing other information necessary to implement the adjustment.

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 ▶ *Kenneth Bernice* Date ▶ 2/7/18

Print your name ▶ KENNETH BERNICE Title ▶ SENIOR VP OF 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.			

NORTHSTAR REALTY EUROPE CORP.
FORM 8937
2017 TAX YEAR

PART II, LINE 15:

PER SHARE REDUCTION OF BASIS

<u>Class of Stock</u>	<u>CUSIP</u>	<u>Payment Date</u>	<u>Amount Distributed per Share</u>	<u>Return of Capital per Share</u>	<u>Return of Capital % per Share</u>
Common	66706L101	3/24/2017	\$ 0.15000	\$ 0.15000	100.00%
Common	66706L101	5/19/2017	\$ 0.15000	\$ 0.15000	100.00%
Common	66706L101	8/18/2017	\$ 0.15000	\$ 0.15000	100.00%
Common	66706L101	11/24/2017	\$ 0.15000	\$ 0.15000	100.00%