## (December 2017) Department of the Treasury

## **Report of Organizational Actions Affecting Basis of Securities**

► See separate instructions.

OMB No. 1545-0123

Internal Revenue Service Reporting Issuer Part I 2 Issuer's employer identification number (EIN) 1 Issuer's name Uniti Group Inc 46-5230630 3 Name of contact for additional information 4 Telephone No. of contact 5 Email address of contact 501-748-7000 Clay.robinson@uniti.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 2101 Riverfront Drive, Suite A Little Rock, AR 72202 8 Date of action 9 Classification and description July 29, 2025 Common Stock 10 CUSIP number 11 Serial number(s) 12 Ticker symbol 13 Account number(s) UNIT(NASDAQ listed) 91325V108 Not Applicable Organizational Action Attach additional statements if needed. See back of form for additional questions. Part II 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 July 29, 2025, Uniti Group, Inc. changed its State of incorporation from Maryland ("Old Uniti") to Delaware ("New Uniti") in a reorganization under IRC section 368(a)(1)(F). Accordingly, for federal income tax purposes, Old Uniti transferred its assets to New Uniti in exchange for stock of New Uniti and the assumption of liabilities, which exchange was a nonrecognition transaction for Old Uniti under IRC section 361 and IRC section 357. New Uniti recognized no gain or loss under IRC section 1032. In addition, Old Uniti distributed the New Uniti stock to its shareholders in exchange for their stock in Old Uniti. Old Uniti recognized no gain or loss under IRC section 361, and the shareholders of Old Uniti recognized no gain or loss under IRC section 354, 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 15 share or as a percentage of old basis ► The basis of each shareholder in each share of Old Uniti transferred to the share of New Uniti received in exchange therefor under IRC section 358, 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 basis of each shareholder in each share of Old Uniti transferred to the share of New Uniti received in exchange therefor under IRC section 358,

Part		Organizational Action (contin	nued)		
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		applicable Internal Revenue Code se			
IRC section 368(a)(1)(F); IRC section 354; IRC section 357; IRC section 358; IRC section 361; IRC section 1032.					72.
18 Can any resulting loss be recognized? ► No loss may be recognized by shareholders exchanging shares in a reorganization describe					
IRC section 368(a)(1)(F).					
Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶					
The reportable tax year is the calendar year 2025.					
					ts, and to the best of my knowledge and
	belie	pelief, 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 Vay Nohin		0	14 0005
пеге	Signa	ature Vary Russ	The state of the s	Date ► <b>9.</b>	11.2025
	Drint	your name ► Clay Robinson		Title ► Vice Pr	esident of Tax
Paid	] Friiit	Print/Type preparer's name	Preparer's signature	Date Date	Check   if PTIN
Prep	arer	Bradley Frerich	Brad Freich	09/11/202	
Use		Firm's name ► ERNST & YOUNG	GU.S. LLP		Firm's EIN ► 34-6565596
		Firm's address ► 2323 VICTORY A	VENUE, SUITE 2000, DALLAS, TX	75219	Phone no. 214-969-8000

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054