



**Part II Organizational Action** (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ Sections 1001 and 1012; Section 304(a)(1); Section 302(a), or Sections 302(d) and 301(c)(1).

18 Can any resulting loss be recognized? ▶ Yes  
As discussed in 15 above, certain former IHS Inc. shareholders may be treated as having received shares of IHS Markit Ltd. as a dividend pursuant to Section 304(a)(1), rather than in a sale or exchange. Such shareholders are urged to consult their own tax advisors with respect to the amount and timing of loss recognition.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The transaction is reportable by each former IHS Inc. shareholder in their tax year that includes July 12, 2016.

Former IHS Inc. shareholders are urged to consult their own tax advisors with respect to their respective tax consequences of the merger. The information contained in this document does not constitute tax advice.

The Issuer is providing this information for informational purposes notwithstanding that the merger may not constitute an "organizational action."

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 ▶ 7-19-2016

<b>Paid Preparer Use Only</b>	Print your name ▶ <u>Michael sharp</u>	Preparer's signature	Title ▶ <u>Vice President</u>	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶			Firm's EIN ▶	
	Firm's address ▶			Phone no.	