

Form **8937**
(December 2017)
Department of the Treasury
Internal Revenue Service

Report of Organizational Actions Affecting Basis of Securities

OMB No. 1545-0123

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name DIGITALBRIDGE GROUP, INC		2 Issuer's employer identification number (EIN) 46-4591526	
3 Name of contact for additional information DIGITALBRIDGE INVESTOR RELATIONS	4 Telephone No. of contact 561-570-4644	5 Email address of contact SEVERIN.WHITE@DIGITALBRIDGE.COM	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 750 PARK OF COMMERCE DRIVE, SUITE 210		7 City, town, or post office, state, and ZIP code of contact BOCA RATON, FL 33487	
8 Date of action SEE ATTACHED STATEMENT		9 Classification and description DISTRIBUTIONS TO COMMON STOCK SHAREHOLDERS	
10 CUSIP number SEE ATTACHED	11 Serial number(s) N/A	12 Ticker symbol DBRG	13 Account number(s) N/A

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 ▶ DIGITALBRIDGE GROUP, INC ("DBRG") MADE CASH DISTRIBUTIONS ON ITS COMMON STOCK TO SHAREHOLDERS OF RECORD DURING 2024. SEE ATTACHMENT FOR THE AMOUNT AND THE DATE OF THE 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 ▶ DBRG CURRENTLY ESTIMATES THE IMPACT TO COMMON SHAREHOLDERS OF EACH DISTRIBUTION IS A 100% REDUCTION IN THE TAX BASIS OF THE CLASS A & B SHARES.

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 ▶ DISTRIBUTIONS IN EXCESS OF E&P ARE TREATED AS NON-TAXABLE AND REDUCE THE ADJUSTED BASIS OF STOCK. THE 100% OF REDUCTION IN TAX BASIS WAS DETERMINED BASED ON THE MOST CURRENT ESTIMATES OF E&P AVAILABLE. DBRG'S EARNINGS AND PROFITS WERE CALCULATED UNDER IRC SECTION 312 AND THE REGULATIONS THEREUNDER.

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 SECTIONS 316 AND 301(C).

18 Can any resulting loss be recognized? ►
NOT APPLICABLE.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ► THESE ACTIONS ARE EFFECTIVE ON THE DATE(S) OF THE DISTRIBUTIONS IDENTIFIED ON THE ATTACHMENT. THE RETURN OF CAPITAL IN ITEM 15 ABOVE IS BASED ON THE MOST CURRENT ESTIMATED EARNINGS AND PROFITS INFORMATION AT THE TIME THIS FORM IS PUBLISHED FOR THE REPORTABLE TAX YEAR 2024. THE ABOVE INFORMATION DOES NOT CONSTITUTE TAX ADVICE. IT IS RECOMMENDED THAT STOCKHOLDERS CONSULT WITH THEIR OWN TAX ADVISORS REGARDING INCOME TAX CONSEQUENCES.

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.
Signed by: Casey Crooks
Signature ► _____ Date ► 1/28/2025
Print your name ► CASEY CROOKS Title ► MANAGING DIRECTOR

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	<u>ALICE PARK</u>		<u>01/28/2025</u>		<u>P01382754</u>
	Firm's name ► <u>HOLTHOUSE CARLIN & VAN TRIGT LLP</u>	Firm's EIN ► <u>95-3435526</u>		Firm's address ► <u>18565 JAMBOREE ROAD, SUTIE 400 IRVINE, CA 92612</u>	
				Phone no. <u>714-361-7600</u>	

ATTACHED TO IRS FORM 8937
 PART II REPORT OF THE ORGANIZATION ACTIONS AFFECTING BASIS OF SECURITIES

DIGITALBRIDGE GROUP, INC. - 2024 COMMON DISTRIBUTIONS
--

<u>Class of Stock</u>	<u>CUSIP</u>	<u>Record Date</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	25401T603	12/31/2023	1/16/2024	\$ 0.01000	\$ 0.01000	100.00%
Common	25401T603	3/31/2024	4/15/2024	\$ 0.01000	\$ 0.01000	100.00%
Common	25401T603	6/30/2024	7/15/2024	\$ 0.01000	\$ 0.01000	100.00%
Common	25401T603	9/30/2024	10/15/2024	\$ 0.01000	\$ 0.01000	100.00%