

Prologis Announces Tax Treatment of Duke Realty Corporation's 2022 Dividends

SAN FRANCISCO, Jan. 26, 2023 /PRNewswire/ -- Prologis, Inc. (NYSE: PLD), the global leader in logistics real estate, today announced the tax treatment of Duke Realty Corporation (NYSE: DRE) 2022 distributions. The exhibit reflects the per share tax treatment of Duke Realty Corporation's common stock distribution, as prescribed by the Internal Revenue Code.

In October 2022, Prologis announced that it had completed its acquisition of Duke Realty Corporation for \$23 billion, including assumption of debt. In connection with the transaction, each share of Duke Realty Corporation common stock was converted into the right to receive 0.475 of a share of Prologis common stock. All distributions from and after the merger are paid in respect of the common stock of Prologis into which the Duke Realty Corporation shares were converted.

Persons who held shares of common stock of Duke Realty Corporation in their name at any time during 2022 will receive an IRS Form 1099-DIV via EQ - Equiniti, Duke Realty Corporation's transfer agent. Persons who held shares in "street name" during 2022 should note that the Form 1099-DIV will be provided by a bank, brokerage firm or nominee. Additional information herein may be needed to properly complete a federal tax return.

This information has been prepared using the best available information to date. Duke Realty Corporation's federal income tax return for the 2022 tax year, has not yet been filed. Please note that federal tax laws affect taxpayers differently, and we cannot advise on how distributions should be reported. Please also note that state and local taxation of REIT distributions may differ from federal rules. Prologis, Inc. recommends consultation with a tax advisor regarding the federal, state, and local income tax consequences of these distributions.

Exhibit Tax Treatment of 2022 Common Dividends

Duke Realty Corporation
Common Stock
CUSIP # 264411505
Ticker Symbol: DRE

Record Date	Payable Date	Cash Distribution	Ordinary Taxable Income (1)	Qualified Taxable Dividend (1)	Long-Term Capital Gain (2)	Unrecaptured Section 1250 Gain (2)	Nondividend distributions	Section 199A Dividends	Section 1061 One Year Amounts Disclosure (3)	Section 1061 Three Year Amounts Disclosure (3)	St
2/16/2022	2/28/2022	0.280000	0.222720	0.042925	0.006197	0.002063	0.006095	0.222720	0.008260	0.008260	
5/16/2022	5/31/2022	0.280000	0.118660	0.042925	0.006197	0.002063	0.110155	0.118660	0.008260	0.008260	
9/15/2022	9/30/2022	0.280000	0.118660	0.042925	0.006197	0.002063	0.110155	0.118660	0.008260	0.008260	

(1) The sum of these amounts will be reported in Box 1a of Form 1099-DIV as Total Ordinary Dividends.

(2) The sum of these amounts will be reported in Box 2a of Form 1099-DIV as Total Capital Gain Distributions.

(3) For purposes of section 1061 of the Internal Revenue Code, Prologis, Inc. is disclosing two additional amounts related to the capital gain distribution. Section 1061 is generally applicable to direct and indirect holders of "applicable partnership interests."

ABOUT PROLOGIS

Prologis, Inc. is the global leader in logistics real estate with a focus on high-barrier, high-growth markets. As of December 31, 2022, the company owned or had investments in, on a wholly owned basis or through co-investment ventures, properties and development projects expected to total approximately 1.2 billion square feet (113 million square meters) in 19 countries. Prologis leases modern logistics facilities to a diverse base of approximately 6,600 customers principally across two major categories: business-to-business and retail/online fulfillment.

FORWARD-LOOKING STATEMENTS

The statements in this document that are not historical facts are forward-looking statements within the meaning of Section 27A of the Securities Act of 1933, as amended, and Section 21E of the Securities Exchange Act of 1934, as amended. These forward-looking statements are based on current expectations, estimates and projections about the industry and markets in which we operate as well as management's beliefs and assumptions. Such statements involve uncertainties that could significantly impact our financial results. Words such as "expects," "anticipates," "intends," "plans," "believes," "seeks," and "estimates," including variations of such words and similar expressions, are intended to identify such forward-looking statements, which generally are not historical in nature. All statements that address operating performance, events or developments that we expect or anticipate will occur in the future—including statements relating to rent and occupancy growth, development activity, contribution and disposition activity, general conditions in the geographic areas where we operate, our debt, capital structure and financial position, our ability to form new co-investment ventures and the availability of capital in existing or new co-investment ventures—are forward-looking statements. These statements are not guarantees of future performance and involve certain risks, uncertainties and assumptions that are difficult to predict. Although we believe the expectations reflected in any forward-looking statements are based on reasonable assumptions, we can give no assurance that our expectations will be attained and, therefore, actual outcomes and results may differ materially from what is expressed or forecasted in such forward-looking statements. Some of the factors that may affect outcomes and results include, but are not limited to: (i) national, international, regional and local economic and political climates; (ii) changes in global financial markets, interest rates and foreign currency exchange rates; (iii) increased or unanticipated competition for our properties; (iv) risks associated with acquisitions, dispositions and development of properties; (v) maintenance of real estate investment trust status, tax structuring and changes in income tax laws and rates; (vi) availability of financing and capital, the levels of debt that we maintain and our credit ratings; (vii) risks related to our investments in our co-investment ventures, including our ability to establish new co-investment ventures; (viii) risks of doing business internationally, including currency risks; (ix) environmental uncertainties, including risks of natural disasters; (x) risks related to the current coronavirus pandemic; and (xi) those additional factors discussed in reports filed with the Securities and Exchange Commission by us under the heading "Risk Factors." We undertake no duty to update any forward-looking statements appearing in this document except as may be required by law.

SOURCE Prologis, Inc.



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