

# Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

## Part I Reporting Issuer

<b>1</b> Issuer's name  Atlas Corp.		<b>2</b> Issuer's employer identification number (EIN)  98-1529261	
<b>3</b> Name of contact for additional information  Atlas Corp. Investor Relations	<b>4</b> Telephone No. of contact  +1-604-638-2575	<b>5</b> Email address of contact  IR@atlascorporation.com	
<b>6</b> Number and street (or P.O. box if mail is not delivered to street address) of contact  23 Berkeley Square		<b>7</b> City, town, or post office, state, and ZIP code of contact  London, United Kingdom, W1J 6HE	
<b>8</b> Date of action  April 30, 2021		<b>9</b> Classification and description  Common Shares	
<b>10</b> CUSIP number  Y0436Q109	<b>11</b> Serial number(s)	<b>12</b> Ticker symbol  ATCO	<b>13</b> Account number(s)

## 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 ▶ During 2021, Atlas Corp. declared the following cash distributions per share to the common shareholders of record as of the dates specified below:

\$0.12500 per share held as of January 20, 2021 (Q1 distributions)  
\$0.12500 per share held as of April 20, 2021 (Q2 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 ▶ Dividends paid in excess of the current and accumulated earnings and profits of a corporation reduce the basis of the shares of the corporation pursuant to Internal Revenue Code 301(c)(2) and 316(a).

The current year distributions are in excess of the 2021 earnings and profits.  
As a result, the basis of each share held as of the dates of record should be approximately reduced as follows:  
\$0.04914 per share held as of January 20, 2021  
\$0.04914 per share held as of April 20, 2021

**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 ▶ Based on Atlas Corp's current and accumulated earnings and profits, a portion of the distributions per share were paid out of current and accumulated earnings and profits as follows and were allocated in order of cash distributions:

\$0.07586 per share held as of January 20, 2021  
\$0.07586 per share held as of April 20, 2021

The remaining cash distributions should reduce the basis of each share held by each shareholder as of the dates of record as described in section (15) above.

**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 316 and 301(c)

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**18** Can any resulting loss be recognized? ▶ For US federal income tax purposes, the distributions will not result in any tax loss for any common shareholder of Atlas Corp.

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**19** Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The reportable tax year is 2021.

Shareholders as of the following dates of record should reduce the basis of each share held on those dates, by the following amount per share:

\$0.04914 per share held as of January 20, 2021

\$0.04914 per share held as of April 20, 2021

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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 ▶ February 17, 2022

Print your name ▶ GRAHAM TALBOT Title ▶ CFO

<b>Paid Preparer Use Only</b>	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.