See separate instructions.

Part I Reporting Issuer

1 Issuer's name	2 Issuer's employer identification number (EIN)			
Atlas Corp.		98-1529261		
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact		
Atlas Corp. Investor Relations	+1-604-638-2575	IR@atlascorporation.com		
6 Number and street (or P.O. box if mail is not o	7 City, town, or post office, state, and ZIP code of contact			
23 Berkeley Square		London, United Kingdom, W1J 6HE		
8 Date of action	9 Classification and description			
January 31, 2022	Series I Preferred Shares			
10CUSIP number11Serial number(s)	12 Ticker symbol	13 Account number(s)		
Y0436Q158	ATCO/PI			
Part II Organizational Action Attack	n additional statements if needed. See	e back of form for additional questions.		
	•	e against which shareholders' ownership is measured for		
the action During 2022, Atlas Corp. declared the following cash distributions per share to the Series I preferred shareholders of				
record as of the dates specified below:				
*0 E00000 per obaro hold on of Japuany 20, 202	2 (O1 distributions)			
\$0.500000 per share held as of January 28, 202				

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 less than the 2022 earnings and profits of Atlas Corp.
On such basis, the full amount of the distributions per share were paid out of current and accumulated earnings and profits and are allocated in order of the cash distributions. The basis of each share held as of the dates of record should not be affected.

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, the full amount of the distributions per share were paid out of current and accumulated earnings and profits and are allocated in order of cash distributions. The basis of each share held as of the date of record should not be affected.

Form 8937 (12-2017) Page 2				
Par	t II	Drganizational Action (continued)		
17		applicable Internal Revenue Code section(s) and subsection(s) (pon which the tax treatment is based IRC 316 and 301(c)	
18	Can an	resulting loss be recognized?	urposes, the distributions will not result in any tax loss for any	
		reholder of Atlas Corp.		
19	Provide	any other information necessary to implement the adjustment, s	such as the reportable tax year \blacktriangleright The reportable tax year is 2022.	
	Linda	pagaitias of parium. I dealars that I have examined this return, including	g accompanying schedules and statements, and to the best of my knowledge and	
	belief	it is true, correct, and complete. Declaration of preparer (other than offic	er) is based on all information of which preparer has any knowledge.	
Sign		Part		
Sign Here Signature ► Date ► March 11, 2022		Date March 11, 2022		
		rour name ► GRAHAM TALBOT Print/Type preparer's name Preparer's signature	Title► CFO Date CFo is PTIN	
Paic		Print/Type preparer's name Preparer's signature	Check if Self-employed	
	oarer Only	Firm's name	Firm's EIN ►	
056	Unity	Firm's address ►	Phone no.	