## Form **8937** (December 2017) Department of the Treasury

Internal Revenue Service

## Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

OMB No. 1545-0123

Part I Reporting Issuer 2 Issuer's employer identification number (EIN) Issuer's name Corporate Office Properties Trust 23-2947217 3 Name of contact for additional information 4 Telephone No. of contact 5 Email address of contact Jack Lopez, Tax Director 6 Number and street (or P.O. box if mail is not delivered to street address) of contact 7 City, town, or post office, state, and ZIP code of contact 6711 Columbia Gateway Drive, Suite 300 Columbia, MD 21046 8 Date of action 9 Classification and description December 31, 2021 Common Shares 10 CUSIP number 11 Serial number(s) 12 Ticker symbol 13 Account number(s) OFC N/A Organizational Action Attach additional statements if needed. See back of form for additional questions. Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ Cash distributions were paid in 2021 as described below. A portion of each of the cash distributions paid was a non-dividend distribution. \$0.275 per share was paid on 04/15/2021 to common shareholders of record as of 03/31/2021 \$0.275 per share was paid on 07/15/2021 to common shareholders of record as of 06/30/2021 \$0.275 per share was paid on 10/15/2021 to common shareholders of record as of 09/30/2021 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 15 share or as a percentage of old basis ▶ The common shareholders should reduce the basis in the common shares as a result of the non-dividend distribution. The amount of the non-dividend distributions were as follows: \$0.0257 per share for the distribution paid on 04/15/2021 \$0.0257 per share for the distribution paid on 07/15/2021 \$0.0257 per share for the distribution paid on 10/15/2021 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 ▶ The non-dividend distributions were calculated as the amount of cash distributed in excess of the company's earnings and profits.

Pa	rt II	Organizational Action (continued)			
17	List t	the applicable Internal Revenue Code section(s) and subsection(s) upon wh	nich the tax treatment	is based ▶	
IRC :	Sectio	on 301(c)(2)			
18	Can a	any resulting loss be recognized? ▶			
No					
19	Provi	vide any other information necessary to implement the adjustment, such as	the reportable tax ye	ar ▶	
The	report	table tax year is 2021.			
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	Ur	Inder penalties of perjury, I declare that I have examined this return, including accom	npanying schedules and	statements	and to the best of my knowledge and
		elief, it is true, correct, and complete. Declaration of preparer (other than officer) is based			
Sigi Her	_	ignature Anthony Mifal	Date <b>▶</b>	January 3	1, 2022
		rint your name ► Anthony Mifsud  Print/Type preparer's name  Preparer's signature	Title ► Date	CFO	Observation is PTIN
Pai					Check if self-employed
	pare Onl				Firm's EIN ▶
	<i></i>	Firm's address ►			Phone no.
Senc	Form	n 8937 (including accompanying statements) to: Department of the Treasur	y, Internal Revenue S	ervice, Ogo	den, UT 84201-0054