

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name Bristow Group Inc.		2 Issuer's employer identification number (EIN) 72-1455213	
3 Name of contact for additional information Grant Newman	4 Telephone No. of contact 713 267-7600	5 Email address of contact grant.newman@bristowgroup.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 3151 Briarpark Drive, Suite 700		7 City, town, or post office, state, and ZIP code of contact Houston, Texas 77042	
8 Date of action June 11, 2020		9 Classification and description Bristow common stock, par value \$0.0001	
10 CUSIP number 11040G103	11 Serial number(s)	12 Ticker symbol VTOL	13 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 ▶

On June 11, 2020, Bristow Group Inc. ("Bristow") and Era Group Inc. ("Era") combined their businesses by consummating the transactions contemplated by the Agreement and Plan of Merger (the "Merger Agreement"), dated as of January 23, 2020, by and between Bristow, Era and Ruby Redux Merger Sub, Inc. ("Merger Sub"), a newly formed, wholly owned subsidiary of Era. Pursuant to the Merger Agreement, Merger Sub merged with and into Bristow, with Bristow surviving the merger. As a result of the merger, Bristow became a wholly owned subsidiary of Era.

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 ▶

Bristow is taking the position that the merger qualified as a "reorganization" within the meaning of section 368(a) of the Internal Revenue Code of 1986, as amended (the "Code"). A Bristow shareholder's aggregate tax basis in shares of Era common stock received in the merger, including any fractional share interests deemed to be received and exchanged, will equal the aggregate tax basis of the Bristow common stock surrendered in the merger. A Bristow shareholder who receives cash in lieu of a fractional share of Era common stock in the merger will be treated as having received a fractional share in the merger and then as having received the cash in exchange for such fractional share. The aggregate tax basis in the Era shares received in the exchange will generally equal the aggregate tax basis in the corresponding Bristow shares that were surrendered in the exchange.

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 ▶

In the merger, each share of Bristow common stock is exchanged for 0.502096 shares of Era common stock. To compute the basis in each share of Era stock received in the merger, a former Bristow shareholder would divide the basis in the corresponding Bristow share surrendered in exchange therefor by 0.502096.

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ Section 354(a), Section 356, Section 358, Section 368(a) and Section 1001.

18 Can any resulting loss be recognized? ▶

The merger was intended to qualify as a "reorganization" within the meaning of Section 368(a) of the Code. Provided that the merger so qualifies as a "reorganization," a holder of Bristow common stock will not recognize any gain or loss for U.S. federal income tax purposes upon the exchange of the holder's shares of Bristow common stock for shares of Era common stock in the merger. A Bristow shareholder who receives cash in lieu of a fractional share of Era common stock in the merger will be treated as having received a fractional share in the merger and then as having received the cash in exchange for such fractional share. As a result, such a Bristow shareholder should generally recognize capital gain or loss equal to the difference between the amount of the cash received in lieu of the fractional share and the shareholder's tax basis allocable to such fractional share.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶

Bristow cannot offer tax advice. Shareholders should consult their own tax advisors regarding the application of the Code to their particular circumstances. For Bristow shareholders whose tax year is the calendar year, the reportable tax year is the calendar year ending December 31, 2020.

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.

Signature ▶ Jennifer Whalen Date ▶ 24-Jul-2020
Jennifer Whalen (Jul 23, 2020 20:40 CDT)

Print your name ▶ Jennifer Whalen Title ▶ Senior Vice President- C.F.O.

Paid Preparer Use Only	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.