

Part II Organizational Action (continued)

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

Horizontal lines for providing details for question 17.

18 Can any resulting loss be recognized? ▶ See Attachment to Form 8937.

Horizontal lines for providing details for question 18.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The Merger (as defined in the Attachment to Form 8937 for Box 14) was consummated on September 20, 2018. Consequently, the reportable taxable year of holders of CQH Common Shares (as defined in the Attachment to Form 8937 for Box 14) for reporting the tax effect of the Merger is the taxable year that includes September 20, 2018.

Former holders of CQH Common Shares are urged to consult with their own tax advisors with respect to their individual tax consequences of the Merger.

Horizontal lines for providing additional information for question 19.

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 ▶ [Signature] Date ▶ October 2, 2018
Print your name ▶ Omer Chadha Title ▶ Director, Tax

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.			

Cheniere Energy, Inc.
EIN: 95-4352386
Attachment to Form 8937

Part II, Box 14:

On September 20, 2018, pursuant to the Merger Agreement, dated as of June 18, 2018, by and among Cheniere Energy, Inc. ("Cheniere"), Columbia Acquisition Sub LLC, a wholly owned subsidiary of Cheniere ("Merger Sub"), and Cheniere Energy Partners LP Holdings, LLC ("CQH"), CQH merged with and into Merger Sub with Merger Sub surviving (the "Merger"). Pursuant to the Merger, each common share of CQH representing limited liability company interests in CQH (all such shares, "CQH Common Shares") outstanding at the time at which the Merger became effective and not owned by Cheniere was cancelled and converted into the right to receive 0.4750 shares of common stock, par value \$0.003, of Cheniere ("Cheniere Common Stock"), with cash paid in lieu of a fractional share of Cheniere Common Stock.

Part II, Box 16:

The information contained herein does not constitute tax advice and does not purport to be complete or to describe the consequences that may apply to particular categories of holders of CQH Common Shares.

Further discussion of material U.S. federal income tax consequences of the Merger can be found in the Form S-4 for Cheniere as filed with the Securities and Exchange Commission on July 18, 2018 as amended (Registration No. 333-226231), under the heading "Material U.S. Federal Income Tax Consequences" (the "Form S-4") and the information contained herein is subject to that discussion in all respects.

The Merger will be reported as a reorganization within the meaning of Section 368(a) of the Internal Revenue Code of 1986, as amended (the "Code"). Assuming that the Merger is respected as a "reorganization", with respect to each U.S. holder of CQH Common Shares, the aggregate tax basis of the Cheniere Common Stock received in the Merger (including any fractional share of Cheniere Common Stock for which cash is received) will be the same as such holder's aggregate tax basis of the CQH Common Shares surrendered in exchange therefor.

If U.S. holders of CQH Common Shares acquired different blocks of CQH Common Shares at different times or at different prices, such holders' tax basis may be determined by reference to each block of CQH Common Shares. Any such holders should consult their tax advisors regarding the manner in which Cheniere Common Stock received in the Merger should be allocated among different blocks of CQH Common Shares and with respect to identifying the bases of the particular CQH Common Shares surrendered in the Merger.

A U.S. holder of CQH Common Shares who receives cash in lieu of a fractional share of Cheniere Common Stock in the Merger will be treated as having received such fractional share pursuant to the Merger and then as having exchanged such fractional share for cash in a

redemption by Cheniere. As a result, such U.S. holder will generally recognize gain or loss in an amount equal to the difference between the amount of cash received and such CQH Shareholder's adjusted tax basis in such fractional share.

Part II, Box 18:

The Merger will be reported as a "reorganization" within the meaning of Section 368(a) of the Code. As described in the response to Box 16 and in the Form S-4, if the Merger is respected as a "reorganization" within the meaning of Section 368(a) of the Code, a U.S. holder of CQH Common Shares will not recognize any loss upon receipt of Cheniere Common Stock in the Merger, except with respect to any cash received in lieu of a fractional share of Cheniere Common Stock. A U.S. holder of Cheniere Common Stock who receives cash in lieu of a fractional share of Cheniere Common Stock in the Merger generally will be treated as having received such fractional share in the Merger and then as having received cash in redemption of such fractional share, and may recognize loss as a result of such redemption.