

Report of Organizational Actions Affecting Basis of Securities

OMB No. 1545-0123

► See separate instructions.

Part I Reporting Issuer

1 Issuer's name		2 Issuer's employer identification number (EIN)	
DUKE REALTY CORPORATION		35-1740409	
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact	
TRACY WARD	415-733-9565	TWARD@PROLOGIS.COM	
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	
1800 WAZEE STREET, SUITE 500		DENVER, CO 80202	
8 Date of action		9 Classification and description	
VARIOUS 2022-SEE ATTACHED TABLE		COMMON STOCK QUARTERLY CASH DISTRIBUTIONS	
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)
264411505	N/A	DRE	N/A

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 2022, DUKE REALTY CORPORATION PAID QUARTERLY CASH DIVIDEND DISTRIBUTIONS ON OUTSTANDING SHARES OF COMMON STOCK AS REFLECTED IN THE ATTACHED TABLE. PURSUANT TO INTERNAL REVENUE CODE SECTIONS 301 AND 316, A CORPORATION'S CASH DIVIDEND DISTRIBUTIONS ARE TREATED AS AN ORDINARY TAXABLE "DIVIDEND" TO SHAREHOLDERS TO THE EXTENT OF THE CORPORATION'S CUMULATIVE EARNINGS AND PROFITS. DUKE REALTY CORPORATION'S 2022 TOTAL QUARTERLY CASH DISTRIBUTIONS PAID ON COMMON SHARES EXCEEDED ITS CUMULATIVE EARNINGS AND PROFITS. AS A RESULT, A PORTION OF EACH DISTRIBUTION IS A "NON-DIVIDEND" DISTRIBUTION THAT IS FIRST TREATED AS A NONTAXABLE RETURN OF CAPITAL REDUCING SHAREHOLDER STOCK BASIS AND SECONDLY, AS CAPITAL GAIN INCOME TO THE EXTENT THE "NON-DIVIDEND" DISTRIBUTION PORTION EXCEEDS SHAREHOLDER STOCK BASIS.

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 ► SEE ATTACHMENT FOR A SUMMARY OF THE PER COMMON SHARE "TAXABLE" AND "NON-DIVIDEND" PORTIONS OF EACH QUARTERLY DISTRIBUTION.

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 ► DUKE REALTY CORPORATION DETERMINES ITS ANNUAL EARNINGS AND PROFITS UNDER INTERNAL REVENUE CODE SECTION 312 (AS MODIFIED BY INTERNAL REVENUE CODE SECTION 857(D) FOR A REAL ESTATE INVESTMENT TRUST) AND THE REGULATIONS THEREUNDER. THESE COMPUTATIONS SUPPORT THE CALCULATION OF THE "TAXABLE" AND "NON-DIVIDEND" PORTIONS OF EACH QUARTERLY CASH DISTRIBUTION TO COMMON SHAREHOLDERS.

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ► INTERNAL REVENUE CODE SECTIONS 301(C), 316 AND 312 (AS MODIFIED BY INTERNAL REVENUE CODE SECTION 857(D) FOR A REAL ESTATE INVESTMENT TRUST).

18 Can any resulting loss be recognized? ► NO TAX LOSS IS RECOGNIZED BY SHAREHOLDERS AS A RESULT OF RECEIVING QUARTERLY CASH DISTRIBUTIONS ON COMMON SHARES.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ► THE "TAXABLE" AND "NON-DIVIDEND" PORTIONS OF QUARTERLY CASH DISTRIBUTIONS RECEIVED WILL BE REPORTED TO COMMON SHAREHOLDERS ON FEDERAL FORM 1099-DIV.

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 ► ORIGINAL SIGNED COPY AVAILABLE AT COMPANY'S CORPORATE HEADQUARTERS

Date ► 1/25/2023

Print your name ► NEAL A. LEWIS

Title ► SVP, TAXATION

Paid Preparer Use Only

Print/Type preparer's name

Preparer's signature

Date

Check ☐ if self-employed

PTIN

Firm's name ►

Firm's EIN ►

Firm's address ►

Phone no.

Attachment - Form 8937
Report of Organizational Actions Affecting Basis in Securities

Duke Realty Corporation

EIN: 35-1740409

Cusip: 264411505

Ticker Symbol: DRE

Tax Year Ended: 10/2/2022

Distribution Per Common Share					
<u>Date Declared</u>	<u>Record Date</u>	<u>Payment Date</u>	<u>Taxable Dividend Portion</u>	<u>Non-Dividend Portion</u>	<u>Totals</u>
1/26/2022	2/16/2022	2/28/2022	\$ 0.273905	\$ 0.006095	\$ 0.280000
4/27/2022	5/16/2022	5/31/2022	\$ 0.169845	\$ 0.110155	\$ 0.280000
9/1/2022	9/15/2022	9/30/2022	\$ 0.169845	\$ 0.110155	\$ 0.280000
		Totals	<u>\$ 0.613595</u>	<u>\$ 0.226405</u>	<u>\$ 0.840000</u>
		Percentage	<u>73.0470%</u>	<u>26.9530%</u>	<u>100.0000%</u>