

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name		2 Issuer's employer identification number (EIN)	
DCT INDUSTRIAL TRUST INC.		82-0538520	
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	
08/22/2018		COMMON STOCK	
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)
233153204		DCT	

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 August 22, 2018, DCT Industrial Trust Inc. merged with and into Prologis Inc. with Prologis Inc. surviving. Each common share of DCT Industrial Trust Inc. was exchanged for 1.02 shares of Prologis Inc. common stock. Cash was paid in lieu of the issuance of fractional shares of Prologis Inc. common stock.

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

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 ▶ The change in basis of the Prologis Inc. common stock received is based on the exchange ratio of the merger. Each DCT Industrial Trust Inc. common share was exchanged for 1.02 shares of Prologis Inc. common stock. Any cash paid in lieu of fractional shares is treated as proceeds in the sale of the shares for which such cash was paid.

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), 302, 356, 358, and 368(a).

18 Can any resulting loss be recognized? ▶ The only resulting loss that may be recognized would be the result of receiving cash in lieu of fractional shares if the basis in the exchanged shares is greater than the cash received.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The adjustment to basis would be taken into account in the year in which the merger was effective (e.g., 2018 for calendar year taxpayers).

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 ▶ *Rohn T. Grazer* Date ▶ 9/11/18

Print your name ▶ Rohn Grazer Title ▶ Managing Director, Tax

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	EDDIE BOZEMAN	<i>Eddie Bozeman</i>	9/10/18		P00742238
	Firm's name ▶ DELOITTE TAX LLP				Firm's EIN ▶ 86-1065772
	Firm's address ▶ 191 PEACHTREE STREET, NE SUITE 2000, ATLANTA GA 30303-1924				Phone no. 404-220-1500

DCT Industrial Trust Inc.

82-0538520

Attachment to Form 8937

REPORT OF ORGANIZATIONAL ACTIONS AFFECTING BASIS OF SECURITIES

Form 8937 Part II, Line 15:

The merger of DCT Industrial Trust Inc. into Prologis Inc. qualifies as a tax-free reorganization within the meaning of Section 368(a) of the Internal Revenue Code. As a result, and with the exception of the fractional shares redeemed for cash discussed below, no gain or loss is expected to be recognized by each former DCT Industrial Trust Inc. shareholder ("DCT Shareholder") on the exchange of their DCT Industrial Trust Inc. common shares for Prologis Inc. common stock.

In general, each DCT Shareholder's aggregate basis in the Prologis Inc. shares received in the merger, which for this purpose includes both the actual shares received as well as the fractional shares that are deemed received, is equal to the aggregate basis of DCT Industrial Trust Inc. shares surrendered in the merger (the "Adjusted Basis"). In calculating the Adjusted Basis, each DCT Shareholder will include reductions for the quarterly distributions received during 2018 that will constitute a return of basis under Section 301(c)(2) of the Internal Revenue Code, as amended. As of the time of this filing, the portion of the 2018 quarterly distributions received by each DCT Shareholder that will be treated as a return of basis is not yet known. Consequently, each DCT Shareholder must treat the entire amount of their 2018 quarterly distributions as having no effect on Adjusted Basis until a time in which a subsequent Form 8937 is filed to report the amount of the 2018 quarterly distributions that will constitute a return of basis. If such Form 8937 is subsequently filed, each DCT Shareholder must accordingly reduce the basis of their shares to calculate the Adjusted Basis used in determining the basis of Prologis Inc. common stock received in the merger, as described in this filing.

Adjusted Basis per share of Prologis Inc. common shares for each DCT Shareholder is determined by dividing the aggregate Adjusted Basis by the number of Prologis Inc. common shares received. The number of Prologis Inc. common shares to be received by each DCT Shareholder is calculated by multiplying the number of DCT Industrial Trust Inc. common shares by 1.02 and then treating fractional shares as sold.

Each DCT Shareholder that received cash in lieu of a fractional share of Prologis Inc. common stock is treated as having received such fractional share and then having received such cash in redemption of the fractional share. Gain or loss will be recognized based on the difference between the amount of the cash received and the portion of each DCT Shareholder's Adjusted Basis of the shares of DCT Industrial Trust Inc. exchanged pursuant to the merger which is allocable to such fractional share.