

## Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

**Part I Reporting Issuer**

<b>1</b> Issuer's name		<b>2</b> Issuer's employer identification number (EIN)	
CTO Realty Growth, Inc.		59-0483700	
<b>3</b> Name of contact for additional information	<b>4</b> Telephone No. of contact	<b>5</b> Email address of contact	
Matthew M. Partridge	386-944-5643	mpartridge@ctoreit.com	
<b>6</b> Number and street (or P.O. box if mail is not delivered to street address) of contact		<b>7</b> City, town, or post office, state, and ZIP code of contact	
1140 N. Williamson Blvd., Suite 140		Daytona Beach, FL 32114	
<b>8</b> Date of action		<b>9</b> Classification and description	
12/31/2021		Distribution Payments to Shareholders	
<b>10</b> CUSIP number	<b>11</b> Serial number(s)	<b>12</b> Ticker symbol	<b>13</b> Account number(s)
22948P 103 / 22948Q 200	n/a	CTO / CTO PrA	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 ▶ **CTO Realty Growth, Inc. (the "Company") is organized and operates as a real estate investment trust ("REIT") as determined under Section 856(a). The Company made quarterly distributions to its shareholders as required by Section 857(a)(1). The total distributions of cash made by the Company to its shareholders did not exceed the amount of its current year and accumulated Earnings and Profits determined in accordance with Section 312, as modified by Section 857(d). As such, the total distributions should be reported as ordinary dividends to its shareholders with no return of capital reported for the year ended December 31, 2021.**

See attached schedule for details of quarterly distribution payments.

**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 ▶ **No change in basis.**

See attached schedule for details of quarterly distribution payments.

**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 ▶ **No change in basis.**

See attached schedule for details of quarterly distribution payments.

**Part II** Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ \_\_\_\_\_

[IRC Section 301\(c\)\(2\)](#)

[IRC Section 316](#)

[IRC Section 857](#)

18 Can any resulting loss be recognized? ▶ No

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

[Reportable tax year ended December 31, 2021](#)

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 ▶  Date ▶ March 22, 2022

Print your name ▶ Matthew M. Partridge Title ▶ SVP, Chief Financial Officer, Treasurer

<b>Paid Preparer Use Only</b>	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.			

CTO Realty Growth, Inc.

EIN 59-0483700

Tax Reporting for Year Ended December 31, 2021

Security Description	CUSIP	Ticker	Dividend Record Date	Dividend Payable Date	Gross					Section 199A
					Distribution per Share	Total Ordinary Dividends	Qualified Dividend	Return of Capital	Capital Gain	Dividends
Common	22948Q 101	CTO	3/22/2021	3/31/2021	\$ 1.00000	\$ 1.00000	\$ -	\$ -	\$ -	\$ 1.00000
Common	22948Q 101	CTO	6/21/2021	6/30/2021	\$ 1.00000	\$ 1.00000	\$ -	\$ -	\$ -	\$ 1.00000
Common	22948Q 101	CTO	9/9/2021	9/30/2021	\$ 1.00000	\$ 1.00000	\$ -	\$ -	\$ -	\$ 1.00000
Preferred	22948Q 200	CTO PrA	9/9/2021	9/30/2021	\$ 0.37630	\$ 0.37630	\$ -	\$ -	\$ -	\$ 0.37630
Common	22948Q 101	CTO	12/9/2021	12/30/2021	\$ 1.00000	\$ 1.00000	\$ -	\$ -	\$ -	\$ 1.00000
Preferred	22948Q 200	CTO PrA	12/9/2021	12/30/2021	\$ 0.39844	\$ 0.39844	\$ -	\$ -	\$ -	\$ 0.39844
Total					\$ 4.77474	\$ 4.77474	\$ -	\$ -	\$ -	\$ 4.77474