The AES Corporation made a cash distribution of $0.10 per share of common stock on February 17, 2015 to its shareholders of record on February 3, 2015.

The AES Corporation made a cash distribution of $0.10 per share on February 17, 2015. At this time, and based upon reasonable assumptions by The AES Corporation, this distribution is expected to be a non-taxable return of capital, thereby reducing a shareholder’s basis by $0.10 per share. To the extent the tax basis reduction is in excess of a shareholder’s basis, the excess should be treated as capital gain.

At this time, and based upon reasonable assumptions by The AES Corporation, the February 17, 2015, $0.10 per share cash distribution is expected to be 100% return of capital as The AES Corporation is not expected to have any earnings and profits (current or accumulated) as of December 31, 2015. Pursuant to applicable Treasury Regulations under Section 6045B, if these assumptions turn out to be incorrect, The AES Corporation will file a corrected Form 8937 within 45 days of such determination.
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 301 (c), 312, and 316 (a) of the Internal Revenue Code.

18. Can any resulting loss be recognized? Not applicable.

19. Provide any other information necessary to implement the adjustment, such as the reportable tax year: None.

Sign Here

Signature ▶

Date ▶ Jan 14, 2016

Print your name ▶ Margaret Tighe

Title ▶ Vice President-Tax and Chief Tax Officer

Paid Preparer Use Only

Print/Type preparer’s name
Preparer’s signature
Date
Check □ if self-employed
Firm’s EIN ▶
Firm’s address ▶
Phone no.

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054