

U.S. Federal Income Tax Basis Worksheet

Assumptions: For purposes of the example, we have assumed a taxpayer who held 110 shares of Darden common stock as of the Record Date, with a tax basis of \$40.00 per share with respect to all such Darden common stock.

	<u>Actual</u>	<u>Example</u>
1. Number of Darden shares held as of the Record Date (see footnote 1 below)	_____	110.00 (1)
2. Multiply Line 1 by 0.33. This is the number of Four Corners shares you were entitled to receive.	_____	36.30
3. Tax basis of pre-spin Darden shares (tax basis per share multiplied by number of shares).	_____	\$ 4,400.00
4. Percentage of the tax basis allocated to your post-spin Darden shares (see footnote 2 below).	<u>89.39%</u>	89.39% (2)
5. Percentage of the tax basis allocated to your Four Corners shares (see footnote 2 below)	<u>10.61%</u>	10.61% (2)
6. Multiply Line 3 by Line 4. This is the tax basis of your post-spin Darden shares.	_____	\$ 3,933.16
7. Divide Line 6 by Line 1. This is the tax basis per share of your post-spin Darden shares.	_____	\$ 35.76
8. Multiply Line 3 by Line 5. This is the tax basis of your Four Corners shares.	_____	\$ 466.84
9. Divide Line 8 by Line 2. This is the tax basis per share of your Four Corners shares.	_____	\$ 12.86
10. Subtract the number of Four Corners shares you actually received from Line 2. This is the fractional share of Four Corners that you were entitled to receive.	_____	0.30
11. Multiply Line 9 by Line 10. This is the tax basis of the Four Corners fractional share that was sold for you.	_____	\$ 3.86
12. Subtract Line 11 from Line 8. This is the tax basis of the Four Corners shares that you received.	_____	\$ 462.98
13. Multiply Line 10 by \$20.13 (the cash attributable to a full share). This is the cash you actually received for the Four Corners fractional share that you were entitled to receive.	_____	\$ 6.04
14. Subtract Line 11 from Line 13. This is your capital gain/(loss) from the sale of the Four Corners fractional share. This gain/(loss) may be long-term capital gain/(loss) depending on your holding period.	_____	\$ 2.18

(1) **Line 1 footnote:** This example assumes you acquired all of your Darden shares on the same day at the same price. If you held various blocks of Darden shares, you can allocate your basis for each block using this worksheet for each block.

(2) **Line 4 & 5 footnote:** This example assumes allocation based on opening trading prices of Darden and Four Corners (see calculation below).

Percentage of Pre-Spin Tax Basis Allocable between Darden and Four Corners Shares

Based on November 10, 2015 opening trading prices:

	<u>Darden</u>	<u>Four Corners</u>	<u>Total</u>
1. Opening trading price per share on 11/10/15 from first trade on New York Stock Exchange	\$ 55.19	\$ 19.85	
2. Exchange Factor	1	0.33	
3. Multiply Line 1 by Line 2	\$ 55.19	\$ 6.55	\$ 61.74
4. Percentage of tax basis allocable between Darden and Four Corners shares	89.39%	10.61%	100%

Numbers shown on this worksheet are rounded to two decimal places if applicable.

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