

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 §305(a), §307(a), and §1223(4).

Blank lines for providing applicable Internal Revenue Code sections.

18 Can any resulting loss be recognized? ▶ No loss can be recognized in connection with the share dividend.

Blank lines for providing information regarding resulting loss recognition.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The company cannot offer tax advice. The US federal income tax rules are very complex and we urge you to consult your own tax advisors regarding the application of these rules to your particular circumstances. The reportable tax year is 2014 with respect to calendar year shareholders.

Blank lines for providing other information necessary to implement the adjustment.

| | | | | |
|-------------------------------|---|-----------------------|-------------------------------------|---|
| 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 ▶ <u>[Signature]</u> | Date ▶ <u>3/13/14</u> | | |
| Paid Preparer Use Only | Print your name ▶ <u>SHAWN PENNE</u> | Preparer's signature | Title ▶ <u>VICE PRESIDENT - TAX</u> | Check <input type="checkbox"/> if self-employed |
| | Print/Type preparer's name | | Date | PTIN |
| | Firm's name ▶ | Firm's EIN ▶ | | |
| | Firm's address ▶ | Phone no. | | |

Liberty Global plc
EIN: 98-1112770
Form 8937 –Share Dividend March 3, 2014

Form 8937, Part I: Questions 10 and 12, CUSIP and Ticker Symbols

| Description | CUSIP Number | Ticker Symbol |
|---|---------------------|----------------------|
| class A ordinary shares of Liberty Global plc | G5480U 104 | LBTYA |
| class B ordinary shares of Liberty Global plc | G5480U 112 | LBTYB |
| class C ordinary shares of Liberty Global plc | G5480U 120 | LBTYK |

Form 8937, Part II: Question 14, Organizational Action

Liberty Global’s Board of Directors approved a share dividend of one Liberty Global Class C ordinary share on each outstanding Class A, Class B and Class C ordinary share to shareholders as of the record date of February 14, 2014 (the “Dividend”). Shareholders of record received one Class C ordinary share for each Class A ordinary share, Class B ordinary share and Class C ordinary share held on the record date. The Class C ordinary shares issued pursuant to the Dividend were distributed on March 3, 2014.

Form 8937, Part II: Question 15, Quantitative Effect

For U.S. federal income tax purposes, Liberty Global shareholders should not recognize income, gain or loss on the receipt of the Liberty Global Class C ordinary shares received in the Dividend because of an exemption under Section 305(a) of the Internal Revenue Code of 1986, as amended (the “IRC”).

The allocation of your existing tax basis in your shares to the shares resulting from the Dividend is governed by IRC Section 307(a) and the regulations thereunder which, as discussed below, provide that the U.S. federal income tax basis in the pre-Dividend shares shall be allocated to the post-Dividend shares based on the relative fair market values of these shares. The holding period for determining capital gain or loss with respect to a subsequent taxable disposition by you of a Liberty Global Class C ordinary share received in the Dividend will include the holding period of the pre-Dividend share on which the Liberty Global Class C ordinary share was distributed.

Your U.S. federal income tax basis in the Liberty Global Class C ordinary share you received in the Dividend depends upon the tax basis you had in the Liberty Global Class A ordinary share, Class B ordinary share or Class C ordinary share for which you received the Dividend. In general, you must allocate the pre-Dividend tax basis of each share of Liberty Global held by you before the Dividend between such share and the Liberty Global Class C ordinary share received in the Dividend based on the relative fair market value of each of the shares. We cannot tell you what your tax basis is in your Liberty Global ordinary shares; you will need to determine your tax basis based on how and when you acquired your Liberty Global ordinary shares.

Based on the methodology described below under “Supporting Calculation,” the following chart provides an example of the ratios for allocating tax basis between the pre-Dividend and post-Dividend shares:

| Pre-Dividend Share | Percentage of Basis Allocated to Each Post-Dividend Share |
|---------------------------|--|
| LBTYA | LBTYA 50.87% |
| | LBTYK 49.13% |
| LBTYB | LBTYB 51.01% |
| | LBTYK 48.99% |
| LBTYK | LBTYK 50.00% |
| | LBTYK 50.00% |

Form 8937, Part II: Questions 16, Supporting Calculation

The U.S. federal income tax laws do not specifically identify how to determine the fair market values of the post-Dividend shares for purposes of the tax basis allocation discussed above. Reasonable methods to determine the fair market value may include using either the average of the high and low trading prices of the shares, the opening trading prices, or the closing trading prices as of a consistent date, which may include either the day of the Dividend or the day following the Dividend.

Below are examples of how the tax basis allocation rules for the Dividend would apply if you use the closing trading prices of the shares on March 4, 2014, the day following the Dividend.

| | Share Price | % of Value |
|-------|--------------------|-------------------|
| LBTYA | \$ 43.32 | 50.87% |
| LBTYK | \$ 41.83 | 49.13% |
| Total | <u>\$ 85.15</u> | |
| | | |
| LBTYB | \$ 43.56 | 51.01% |
| LBTYK | \$ 41.83 | 48.99% |
| Total | <u>\$ 85.39</u> | |
| | | |
| LBTYK | \$ 41.83 | 50.00% |
| LBTYK | \$ 41.83 | 50.00% |
| Total | <u>\$ 83.66</u> | |

If you held one Class A ordinary share with a pre-Dividend tax basis of \$80, your tax basis would be allocated between the post-Dividend shares as follows:

$$\begin{aligned} \text{LBTYA} &= \$80.00 \times 50.87\% = \$40.70 \\ \text{LBTYK} &= \$80.00 \times 49.13\% = \$39.30 \end{aligned}$$

If you held one Class B ordinary share with a pre-Dividend tax basis of \$80, your tax basis would be allocated between the post-Dividend shares as follows:

$$\begin{aligned} \text{LBTYB} &= \$80.00 \times 51.01\% = \$40.81 \\ \text{LBTYK} &= \$80.00 \times 48.99\% = \$39.19 \end{aligned}$$

If you held one Class C ordinary share with a pre-Dividend tax basis of \$80, your tax basis would be allocated between the post-Dividend shares as follows:

$$\begin{aligned} \text{LBTYK} &= \$80.00 \times 50.00\% = \$40.00 \\ \text{LBTYK} &= \$80.00 \times 50.00\% = \$40.00 \end{aligned}$$