**Standard Life Aberdeen plc**

**Attachment to Form 8937**

**Part II – Organizational Action**

**Line 14. Describe the organizational action and, if applicable, the date of the action or the date against which shareholders’ ownership is measured for action.**

On October 22, 2018, each shareholder of Standard Life Aberdeen plc (“Standard Life”) received seven newly issued ordinary shares (“New Ordinary Shares”) in exchange for eight of its existing ordinary shares (“Existing Ordinary Shares”) pursuant to the “Share Capital Consolidation,” as described in the Circular to Shareholders and Notice of General Meeting, dated 30 May 2018 (the “Circular”).

In connection with the Share Capital Consolidation, Standard Life also undertook a series of transactions described as the “B Share Scheme” in the Circular.The B Share Scheme should not affect the basis in a shareholder’s Existing Ordinary Shares or New Ordinary Shares. For further information relating to the U.S. federal income tax consequences of the B Share Scheme, please refer to section 6 Part VIII (Taxation) of the Circular.

**Line 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.**

A shareholder should have an aggregate tax basis in the New Ordinary Shares received in the Share Capital Consolidation equal to such shareholder’s aggregate tax basis in the Existing Ordinary Share exchanged therefor. Accordingly, on a per-share basis, each New Ordinary Share should have a basis equal to 8/7 of the basis of each Existing Ordinary Share exchanged therefor.

A shareholder that acquired blocks of Existing Ordinary Shares at different times and at different prices must determine its tax basis and holding period in New Ordinary Shares with reference to each block of Existing Ordinary Shares.

**Line 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.**

See response to Line 15.

**Line 17. List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based.**

Sections354, 358 and 368(a).

**Line 18. Can any resulting loss be recognized?**

No, except with respect to cash received in lieu of fractional shares.

**Line 19. Provide any other information necessary to implement the adjustment, such as the reportable tax year.**

The Share Capital Consolidation occurred in calendar year 2018.

**Consult Your Tax Advisor**

The foregoing discussion does not describe all material U.S. federal income tax consequences of the Share Capital Consolidation or the B Share Scheme. Please consult the Circular for further discussion of the material U.S. federal income tax consequences of the Share Capital Consolidation and the B Share Scheme. In addition, please consult your own tax advisors as to the specific tax consequences to you of the Share Capital Consolidation and the B Share Scheme, including tax return reporting requirements and the applicability and effect of U.S. federal, state, local and foreign income and other tax laws in light of your particular circumstances.