

Report of Organizational Actions Affecting Basis of Securities

Form **8937**
(December 2017)
Department of the Treasury
Internal Revenue Service

OMB No. 1545-0123

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name CyrusOne Inc.	2 Issuer's employer identification number (EIN) 46-0691837
3 Name of contact for additional information	4 Telephone No. of contact 972-350-0060
Investor Relations	5 Email address of contact investorrelations@cyrusone.com
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 2850 N. Harwood St, Suite 2200	7 City, town, or post office, state, and ZIP code of contact Dallas, TX 75201
8 Date of action	9 Classification and description Distributions to holders of the Issuer's common stock

10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)
23283R 100	N/A	CONE	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 ▶ Cash distributions were paid in 2020 as described below. A portion of each of the cash distributions was a non-dividend distribution.

\$0.500000 per share was paid on 1/10/2020 to common shareholders of record as of 1/02/20
 \$0.500000 per share was paid on 4/10/2020 to common shareholders of record as of 3/27/20
 \$0.500000 per share was paid on 7/10/2020 to common shareholders of record as of 6/26/20
 \$0.510000 per share was paid on 10/09/2020 to common shareholders of record as of 9/25/20

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 ▶ CyrusOne Inc. has determined that of the 1/10/20, 4/10/20, and 7/10/20, distributions described above, approximately 9.78314% (or \$0.048916 per share) will be treated as a taxable dividend, 60.18819% (or \$0.300941 per share) will be treated as return of capital under Section 301(c)(2), and 30.02865% (or \$0.150143 per share) will be treated as nondividend distribution. CyrusOne Inc. has also determined that of the 10/09/20 distribution described above, approximately 9.78314% (or \$0.049894 per share) will be treated as a taxable dividend, 60.18819% (or \$0.306960 per share) will be treated as a return of capital under Section 301(c)(2), and 30.02865% (or \$0.153146 per share) will be treated as nondividend distribution. Generally, the portion of each distribution on the common stock that is treated as return of capital should reduce the tax basis in the shares of common stock up to a holder's adjusted basis in the common stock, with any excess treated as capital gains pursuant to Section 301(c)(3). The total return of capital distribution for 2020 is \$70,493,297.

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 ▶ The portion of each distribution that represents a taxable dividend was paid out of current earnings and profits and the nontaxable distributions were calculated as the amount of cash distribution in excess of earnings and profits.

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) provides that the portion of a distribution which is not a dividend (as defined in IRC Section 316) shall be applied against and reduce the adjusted basis of the stock.

18 Can any resulting loss be recognized? ▶ No loss will be recognized on the distributions made during the 2020 tax year.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The reportable tax year is 2020.

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 ▶ 1/29/2021

Print your name ▶ Erik Leban		Title ▶ Vice President Tax	
Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed
Firm's name ▶			PTIN
Firm's address ▶			Firm's EIN ▶
			Phone no.