

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 SECTIONS 302, 356, 358 AND 368(A)

18 Can any resulting loss be recognized? ▶ NO LOSS CAN BE RECOGNIZED UPON THE EXCHANGE OF THE INLAND DIVERSIFIED REAL ESTATE TRUST, INC COMMON STOCK FOR THE SHARES OF KITE REALTY GROUP TRUST COMMON STOCK. IF A TAXABLE LOSS IS CALCULATED WITH RESPECT TO ANY FRACTIONAL SHARE PAID IN CASH THEN THIS LOSS CAN BE RECOGNIZED.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ THE ACTIONS ARE EFFECTIVE ON JULY 1, 2014, THE DATE OF THE MERGER .

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 ▶ Daniel R. Sink Date ▶ 12/9/14

Print your name ▶ Daniel R. Sink Title ▶ EVP + CFO

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	ADAM GOLDFARB	<u>Ad</u>	12/8/14		P01366364
	Firm's name ▶ KPMG LLP	Firm's EIN ▶ 13-5565207		Phone no. 312-665-1000	
	Firm's address ▶ 200 EAST RANDOLPH STREET, STE 5500 CHICAGO, IL 60601				