

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

| | | | |
|--|-----------------------------------|---|-----------------------------|
| 1 Issuer's name | | 2 Issuer's employer identification number (EIN) | |
| Diversified Healthcare Trust | | 04-3445278 | |
| 3 Name of contact for additional information | 4 Telephone No. of contact | 5 Email address of contact | |
| Michael Kodesch | 617-796-8234 | MKODESCH@DHCREIT.COM | |
| 6 Number and street (or P.O. box if mail is not delivered to street address) of contact | | 7 City, town, or post office, state, and ZIP code of contact | |
| 255 Washington Street, Two Newton Place | | Newton, MA 02458 | |
| 8 Date of action | | 9 Classification and description | |
| See Below | | Common Stock | |
| 10 CUSIP number | 11 Serial number(s) | 12 Ticker symbol | 13 Account number(s) |
| 25525P107 | Various | DHC | Various |

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 ▶ The taxpayer made cash distributions to its shareholders in excess of its current and accumulated earnings and profits.
 See Part II, Line 15 for the amount and date of distributions per share.

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 ▶

| | |
|------------|--------|
| 1/01/2020 | 0.2500 |
| 1/27/2020 | 0.1500 |
| 4/13/2020 | 0.0100 |
| 7/27/2020 | 0.0100 |
| 10/26/2020 | 0.0100 |

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 taxpayer's earnings and profits were calculated under IRC 312 (as modified by IRC Section 857(d) for a real estate investment trust) and the regulations thereunder. Amounts in excess of earnings and profits reduce the shareholder's tax basis in its shares to the extent of basis.

Part II Organizational Action *(continued)*

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ Section 301(c)(2) is the applicable code section upon which the tax treatment of the amounts distributed by DHC is based. Sections 358(a), 1001, and 858(a) are the applicable code sections upon which the tax treatment of the above is based.

18 Can any resulting loss be recognized? ▶ With respect to the amounts distributed by DHC, no resulting loss can be recognized.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The basis adjustments for the amounts distributed by DHC are taken into account in the tax year of a DHC shareholder which includes the distribution dates identified above (e.g., 2020 for calendar year taxpayers).

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 ▶ 01/19/2021

Print your name ▶ Richard Siedel Title ▶ CFO/Treasurer

Paid Preparer Use Only

| | | | | |
|----------------------------|----------------------|------|---|------|
| Print/Type preparer's name | Preparer's signature | Date | Check <input type="checkbox"/> if self-employed | PTIN |
| Firm's name ▶ | | | Firm's EIN ▶ | |
| Firm's address ▶ | | | Phone no. | |