

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)	
Manchester United PLC		98-1063519	
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact	
Chris Hallsworth	+44 7464 988 396	chris.hallsworth@manutd.co.uk	
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	
Sir Matt Busby Way		Old Trafford, Manchester, UK, M16 0RA	
8 Date of action		9 Classification and description	
Various		See Box 14 below	
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)
G5784H106		MANU	

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 ISSUER PAID CASH DISTRIBUTIONS TO CLASS A & B SHAREHOLDERS IN JANUARY 2022 AND JUNE 2022. 100% OF THESE DISTRIBUTION CONSITUTE RETURN OF CAPITAL DISTRIBUTIONS. SEE APPENDIX A FOR MORE DETAILS**

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 ▶ **DISTRIBUTIONS PAID IN EXCESS OF THE CURRENT AND ACCUMULATED EARNINGS AND PROFIT OF A CORPORATION REDUCE THE BASIS OF THE STOCK OF THE CORPORATION PURSUANT TO INTERNAL REVENUE CODE (IRC) SECTION 301(C)(2) AND SECTION 316(A). THE CORPORATION ESTIMATES THAT 100% OF DISTRIBUTIONS PAID BY THE ISSUER TO SHAREHOLDERS IN JANUARY 2022 AND JUNE 2022 CONSTITUTE A RETURN OF CAPITAL, WHICH WOULD REDUCE THE TAX BASIS OF THE STOCK OF THE ISSUER HELD BY CLASS A AND CLASS B SHAREHOLDERS FOR U.S. FEDERAL INCOME TAX PURPOSES ON A PER SHARE BASIS.**

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 DISTIRBUTIONS PAID BY THE ISSUER TO SHAREHOLDERS IN JANUARY 2022 AND JUNE 2022 SHOULD CONSTITUTE A RETURN OF CAPITAL AND REDUCE SHAREHOLDER'S BASIS IN ISSUER'S STOCK BY \$0.09 PER SHARE FOR EACH DISTRIBUTION. SEE APPENDIX A.**

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 SEC. 301(C)(2)**
PROVIDES THAT THE PORTION OF A DISTRIBUTION WHICH IS NOT A DIVIDEND SHALL BE APPLIED AGAINST AND REDUCE THE ADJUSTED BASIS OF THE STOCK OF THE ISSUER.

18 Can any resulting loss be recognized? ▶ **FOR US FEDERAL INCOME TAX PURPOSES, AS LONG AS THE SHAREHOLDER HAS SUFFICIENT TAX BASIS IN THE STOCK, THERE SHOULD BE NO TAX LOSS RECOGNIZED BY THE SHAREHOLDERS OF THE ISSUER.**

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ **N/A**

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 ▶ **01/04/2023**

Print your name ▶ **CLIFFORD BATY** Title ▶ **CFO**

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.

Manchester United plc

EIN: 98-1063519

Appendix A – Attachment to Form 8937

CUSIP	Ticker Symbol	Record Date	Pay Date	Distribution per Share
G5784H106	MANU	12/1/2021	1/7/2022	\$0.09
G5784H106	MANU	6/6/2022	6/24/2022	\$0.09