

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name CTO Realty Growth, Inc.		2 Issuer's employer identification number (EIN) 59-0483700	
3 Name of contact for additional information Philip R. Mays	4 Telephone No. of contact 386-274-2202	5 Email address of contact pmays@ctoreit.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 369 N. New York Ave. Suite 201		7 City, town, or post office, state, and ZIP code of contact Winter Park, FL	
8 Date of action 12/31/2024		9 Classification and description Series A Preferred Stock	
10 CUSIP number 22948Q 200	11 Serial number(s) n/a	12 Ticker symbol CTO PrA	13 Account number(s) 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 ▶ CTO Realty Growth, Inc. (the "Company") is organized and operates as a real estate investment trust ("REIT") as determined under Section 856(a). The Company made quarterly distributions to its shareholders as required by Section 857(a)(1). The total distributions of cash made by the Company to its shareholders exceeded the amount of its current year and accumulated Earnings and Profits determined in accordance with Section 312, as modified by Section 857(d). The excess amount of these distributions is treated as a return of capital to its shareholders. As such, the shareholders are required to reduce their tax basis in their stock as per Section 301(c)(2).

See attached schedule for details of quarterly distribution payments.

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 ▶ No change in basis.

See attached schedule for details of quarterly distribution payments.

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 ▶ No change in basis.

See attached schedule for details of quarterly distribution payments.

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\(c\)\(2\)](#)

[IRC Section 316](#)

[IRC Section 857](#)

18 Can any resulting loss be recognized? ▶ [No](#)

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ _____

[Reportable tax year ended December 31, 2024](#)

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 ▶ *Philip R Mays* Date ▶ 1/30/2025

Print your name ▶ Philip R. Mays Title ▶ SVP, Chief Financial Officer, 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.

CTO Realty Growth, Inc.

EIN 59-0483700

Tax Reporting for Year Ended December 31, 2024

Security Description	CUSIP	Ticker	Dividend Record Date	Dividend Payable Date	Gross Distribution per Share	Total Ordinary Dividends	Return of Capital	Capital Gain	Section 199A Dividends
Preferred	22948Q 200	CTO PrA	3/14/2024	3/28/2024	\$ 0.39844	\$ 0.36647	\$ -	\$ 0.03197	\$ 0.36647
Preferred	22948Q 200	CTO PrA	6/12/2024	6/28/2024	\$ 0.39844	\$ 0.36647	\$ -	\$ 0.03197	\$ 0.36647
Preferred	22948Q 200	CTO PrA	9/12/2024	9/30/2024	\$ 0.39844	\$ 0.36647	\$ -	\$ 0.03197	\$ 0.36647
Preferred	22948Q 200	CTO PrA	12/12/2024	12/31/2024	\$ 0.39844	\$ 0.36647	\$ -	\$ 0.03197	\$ 0.36647
Total					\$ 1.59376	\$ 1.46587	\$ -	\$ 0.12789	\$ 1.46587
					100.0000%	91.9753%	0.0000%	8.0247%	