

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) | |
| CTO Realty Growth, Inc. | | 59-0483700 | |
| 3 Name of contact for additional information | 4 Telephone No. of contact | 5 Email address of contact | |
| Philip R. Mays | 386-274-2202 | pmays@ctoreit.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 | |
| 369 N. New York Ave. Suite 201 | | Winter Park, FL | |
| 8 Date of action | | 9 Classification and description | |
| 12/31/2024 | | Common Stock | |
| 10 CUSIP number | 11 Serial number(s) | 12 Ticker symbol | 13 Account number(s) |
| 22948Q 101 | n/a | CTO | 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 ▶ The Company, a publicly traded REIT, paid quarterly distributions to shareholders of its common stock during the year ended December 31, 2024. In January 2025, the Company determined that a portion of the distributions paid represented a return of capital. The percentage of the return of capital will be reported to shareholders of the Company's common stock via Form 1099-DIV.

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 ▶ The calculation for the return of capital portion of the distributions that reduced the tax basis of the common stock held by the Company shareholders during 2024 was determined based on the total amount of distributions less the amount of the corporation's current Earnings and Profits, determined in accordance with Section 312, as modified by Section 857(d).

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 |
|----------------------|------------|--------|----------------------|-----------------------|------------------------------|--------------------------|-------------------|--------------|------------------------|
| Common | 22948Q 101 | CTO | 3/14/2024 | 3/28/2024 | \$ 0.38000 | \$ 0.33940 | \$ 0.01098 | \$ 0.02961 | \$ 0.33940 |
| Common | 22948Q 101 | CTO | 6/12/2024 | 6/28/2024 | \$ 0.38000 | \$ 0.33940 | \$ 0.01098 | \$ 0.02961 | \$ 0.33940 |
| Common | 22948Q 101 | CTO | 9/12/2024 | 9/30/2024 | \$ 0.38000 | \$ 0.33940 | \$ 0.01098 | \$ 0.02961 | \$ 0.33940 |
| Common | 22948Q 101 | CTO | 12/12/2024 | 12/31/2024 | \$ 0.38000 | \$ 0.33940 | \$ 0.01098 | \$ 0.02961 | \$ 0.33940 |
| Total | | | | | \$ 1.52000 | \$ 1.35762 | \$ 0.04393 | \$ 0.11845 | \$ 1.35762 |
| | | | | | 100.00000% | 89.31685% | 2.89043% | 7.79272% | |