► See separate instructions.

1 Issuer's name				2 Issuer's employer identification number (EIN)
				- ······ · ···························
Triton International Limi	ted	98-1276572		
3 Name of contact for a		4 Telephone	e No. of contact	5 Email address of contact
Brandon Davis			(914) 697-2602	BDavis@trtn.com
6 Number and street (or	r P.O. box if mail is not	delivered to s	treet address) of contact	7 City, town, or post office, state, and ZIP code of contact
100 Manhattanville Road 8 Date of action		0 Classi	fication and description	Purchase, NY 10577
o Date of action		9 01855	incation and description	
September 28, 2023		Stock Mo	rger Acquisition	
10 CUSIP number	11 Serial number(s		12 Ticker symbol	13 Account number(s)
		,		
G9078F107			TRTN	
Part II Organizat	tional Action Attac	h additional	statements if needed.	See back of form for additional questions.
-		pplicable, the	date of the action or the d	late against which shareholders' ownership is measured for
the action ► See a	ittachment.			
				urity in the hands of a U.S. taxpayer as an adjustment per
share or as a percer	ntage of old basis \blacktriangleright Se	e attachment	t.	
16 Describe the calcula	ation of the change in b	asis and the d	lata that supports the calc	ulation, such as the market values of securities and the
valuation dates P	lease see response to	Question 15	above.	

rm	8937	(12-2017)	

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Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based **>**

For U.S. federal income tax purposes, the transaction is treated as a taxable sale and/or exchange under the provisions of Sections 1001 and 1012 of the Internal Revenue Code.

18 Can any resulting loss be recognized? Please see response to Question 15 above.

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

Triton common shareholders should review the discussion in the Proxy Statement / Joint Prospectus, under the heading "Certain U.S. Federal Income Tax Consequences." Triton common shareholders are strongly urged to consult with a tax advisor to determine the particular U.S. federal, state or local, or foreign, income or other tax consequences of the transaction. The information in this document does not constitute tax advice and is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties under the Internal Revenue Code.

		Inder penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and elief, 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	Signa	ture BL DD	Date► 10	/31/2023					
	Print	your name ► Brandon Davis	Title► VP, Tax	Title► VP, Tax & FP&A					
Paid Preparer		Print/Type preparer's name	Preparer's signature	Date	Check if self-employed				
Use Or		Firm's name	Firm's EIN ►						
	,	Firm's address 🕨	Phone no.						
Send For	rm 89	37 (including accompanying statement	s) to: Department of the Treasury, I	Internal Revenue Service, O	gden, UT 84201-0054				

Attachment to Form 8937 Report of Organizational Actions Affecting Basis of Securities Triton International Limited EIN: 98-1276572

Part II – Organizational Action

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 **>**

On September 28, 2023 (the "Closing Date"), Brookfield Infrastructure Partners L.P. (NYSE: BIP, TSX: BIP.UN) ("BIP"), through its subsidiary Brookfield Infrastructure Corporation (NYSE: BIPC) ("BIPC") and its institutional partners, completed the acquisition of Triton International Limited (NYSE: TRTN) ("Triton") by way of a merger transaction between Triton and Thanos Mergersub Limited ("the transaction").

The information contained herein does not purport to describe the tax consequences that may apply to particular categories of Triton common shareholders. Each Triton common shareholder is advised to consult his or her tax advisor regarding the tax treatment of the transaction. Further discussion of the tax consequences of the transaction can be found under the heading "Certain U.S. Federal Income Tax Consequences" in the proxy statement / joint prospectus (as amended and as supplemented by Triton's Current Report on Form 8-K filed with the U.S. Securities and Exchange Commission (the "SEC") on August 17, 2023, the "Proxy Statement / Joint Prospectus") included in the registration statement of BIPC and BIP, which was declared effective by the SEC on July 6, 2023.

At the effective time of the transaction, Triton common shareholders were entitled to receive per share consideration equal in value to \$68.50 in cash and 0.3895 BIPC class A exchangeable shares ("BIPC Shares"). Triton common shareholders were entitled to elect to receive consideration in the form of cash, BIPC Shares, or a combination of cash and BIPC Shares.

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 ►

Triton believes that a U.S. Holder (as defined in the Proxy Statement / Joint Prospectus) receiving cash, BIPC Shares, or a combination thereof will recognize gain equal to the excess to the fair market value of the consideration received over the tax basis in the Triton common share surrendered in exchange therefor. If the tax basis in the Triton common share surrendered exceeds the fair market value of the consideration received therefor in the transaction, a loss will be recognized. The deductibility of losses is subject to limitations.

A U.S. Holder's tax basis in the BIPC Shares received in the transaction generally will equal the fair market value of such BIPC Shares at the time of the exchange. BIPC Shares had a closing price of \$35.62 per share on the day immediately prior to the Closing Date. Other reasonable methods for determining the fair market value of BIPC Shares received in the transaction may exist. Each Triton common shareholder should consult his or her independent tax advisor to

determine the appropriate method of determining taxable gain or loss in the transaction and the tax basis of the BIPC Shares. The holding period of BIPC Shares received in the transaction will generally begin on the day after the Closing Date.

For more information regarding the tax consequences of the transaction, please review the discussion in the Proxy Statement / Joint Prospectus, under the heading "Certain U.S. Federal Income Tax Consequences."