## AMENDED

### 89 Form (December 2017) Department of the Treasury Internal Revenue Service 1

# Report of Organizational Actions Affecting Basis of Securities

► See separate instructions.

Part I	Rep	orting	Issue
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P	Part I	Reporting I	ssuer			•
1	Issuer's	s name				2 Issuer's employer identification number (EIN)
			STRUCTURE ETF	4 Telephon	- No. of contract	46-3851948
3	Name c	of contact for add	ct for additional information <b>4</b> Telephone No. of contact			5 Email address of contact
Δ١	DS FLINI	D SERVICES			303-623-2577	
			.O. box if mail is not	delivered to s	treet address) of contact	<b>7</b> City, town, or post office, state, and ZIP code of contact
129	90 BROA	ADWAY, SUITE 1	1100			DENVER, CO 80203
8	Date of	action		9 Class	ification and description	
	OVEMBEI CUSIP	R 30, 2018	11 Serial number(		N STOCK 12 Ticker symbol	13 Account number(s)
10	0001	number		3)		
	001	62Q676			ENFR	
Ρ	art II		onal Action Attac	ch additional		See back of form for additional questions.
14	Descr	ribe the organizat	tional action and, if a	applicable, the	date of the action or the d	late against which shareholders' ownership is measured for
	the ac	ction ► <u>SEE AT</u>	TACHED STATEME	ENT		
	_					
15						urity in the hands of a U.S. taxpayer as an adjustment per
					SHOWN AS A RETURN O AX BASIS ON SHARES H	F CAPITAL IN THE ATTACHED STATEMENT
RE	PRESEN	NISA REDUCTI	UN OF THE SHARE	HULDERS I	AX BASIS UN SHAKES H	ELD.
16	Descr	ibe the calculatio	on of the change in h	asis and the (	data that supports the calc	ulation, such as the market values of securities and the
10			E LINE 15 ABOVE.			
			LINE 13 ADOVE.			
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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 
 PURSUANT TO IRC

 SECTION 301(C)(1), THE PORTION OF A DISTRIBUTION WHICH IS A DIVIDEND (AS DEFINED UNDER IRC SECTION 316) IS INCLUDABLE

 IN GROSS INCOME. PURSUANT TO IRC SECTION 301(C)(2), THE PORTION OF THE DISTRIBUTION WHICH IS NOT A DIVIDEND

 SHALL BE APPLIED AGAINST AND REDUCE THE ADJUSTED BASIS OF THE STOCK.

 18 Can any resulting loss be recognized?
 NOT APPLICABLE TO THIS TRANSACTION AS NO LOSS WOULD BE RECOGNIZED

 ON THE RETURN OF CAPITAL DISTRIBUTION. THE SHAREHOLDER'S COST BASIS SHOULD BE ADJUSTED TO REFLECT THE

 RETURN OF CAPITAL DISTRIBUTION WHICH MAY AFFECT THE GAIN OR LOSS REALIZED UPON THE DISPOSITION OF THE SHARES.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ► <u>PURSUANT TO IRC SECTION 6045</u>, AS AMENDED BY THE EMERGENCY ECONOMIC STABILIZATION ACT OF 2008, BROKERS ARE REQUIRED TO REFLECT THESE ADJUSTMENTS IN THE COST BASIS REPORTING FOR COVERED SECURITIES. IF A BROKER IS NOT REQUIRED TO PROVIDE COST BASIS TO A PARTICULAR SHAREHOLDER, THE COST BASIS OF THE SHAREHOLDER'S SHARES SHOULD BE ADJUSTED AS OF THE DIVIDEND DATE TO REFLECT THE RETURN OF CAPITAL DESCRIBED ABOVE.

				have examined this return, including accom laration of preparer (other than officer) is bas				
Sign Here	Signature ►		A SIGNED CO TAXPAYER	OPY OF THIS FORM IS M	AINTAINED AT THE	OFFICES OF THE		
	Print	your name 🕨						
Paid Prepa	arer	Print/Type p	reparer s name	Freparer S Signature	Date	Check if self-employed		
Use C						Firm's EIN ►		
	<b>y</b>	Firm's addre	ess 🕨		Phone no.			
o								

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054

#### PART II, QUESTION 14:

THE CORPORATION DECLARED THE FOLLOWING DISTRIBUTION TO SHAREHOLDERS DURING THE YEAR ENDED NOVEMBER 30, 2018 THAT RETURN OF CAPITAL WAS APPLICABLE.

DETAIL OF THE DISTRIBUTION MADE IS DESCRIBED BELOW:

				TAXABLE	RETURN OF
RECORD		PAYABLE		DIVIDEND	CAPITAL
DATE	EX-DATE	DATE	AMOUNT	AMOUNT	AMOUNT
3/23/2018	3/22/2018	3/29/2018	\$ 0.174450	\$ 0.143395	\$ 0.031055
6/22/2018	6/21/2018	6/28/2018	\$ 0.192090	\$ 0.157895	\$ 0.034195
9/21/2018	9/20/2018	9/27/2018	\$ 0.169530	\$ 0.139351	\$ 0.030179
Total			\$ 0.536070	\$ 0.440641	\$ 0.095429