(December 2011) Department of the Treasury

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

OMB No. 1545-2224

Internal Revenue Service Part Reporting Issuer 2 Issuer's employer identification number (EIN) 1 Issuer's name **China Steel Corporation** 3 Name of contact for additional information 4 Telephone No. of contact 5 Email address of contact 886-7-337-1111 Ext 23950 153908@mail.csc.com.tw 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 Kaohsiung 80661, Taiwan, ROC No. 88 Cheng-gong 2nd Rd, Qian-zhen 9 Classification and description 8 Date of action September 20, 2013 Global Depositary Shares ("GDSs") and Common Shares ("Shares") 10 CUSIP number 11 Serial number(s) 12 Ticker symbol 13 Account number(s) Y15041125/169417102 TW0002002003 (Shares) CNSD.LI / CHCG.LX / 2002.TT Part I Organizational Action Attach additional statements if needed. See back of form for additional questions. 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 March 21, 2014, the Company announced a stock distribution whereby holders of Common Shares (the "Shares") would receive 20 new Shares for every 1000 existing Shares held as of the applicable record date and holders of GDSs would receive 2 new GDSs for every 100 existing GDSs held as of the applicable record date. The record date for holders of Shares was August 15, 2014. The record date for holders of GDSs was August 14, 2014. The effective date for holders of Shares was September 30, 2014 while the effective date for holders of GDSs was October 7, 2014. 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 15 share or as a percentage of old basis As required by Code Section 307(a), and the U.S. Treasury regulations thereunder, the U.S. tax basis of the Shares previously held by each U.S. holder of Shares (or GDSs) should be allocated between the holder's existing Shares (or GDSs) and the new Shares (or GDSs) received in the distribution based on their respective fair market. The Company has determined that the fair market value of each GDSs as \$16.945 on the GDS effective date. Each holder of Shares (or holders of GDSs) should allocate 98.0392% of its basis in each existing Shares (or GDSs) to each (or GDSs) received in the distribution. 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 ▶ Please refer to item 15.

Part I		Organizational Action (continent	ued)		
		applicable Internal Revenue Code se		ich the tax treatment is based	>
Please	refer t	o item 15.			
18 C:	an anv	resulting loss be recognized? ► Fo	or U.S. federal income tax purpos	es, the Organization Action	will not result in any tax loss
		rs of Shares or GDSs.		oo, are organization reading	
19 Pr	rovide	any other information necessary to in	nplement the adjustment, such as	the reportable tax year ▶ <u>The</u>	reportable taxable year is 2014.
	1				
Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has				s, and to the best of my knowledge and parer has any knowledge.	
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Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054