

## Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

**Part I Reporting Issuer**

<b>1</b> Issuer's name		<b>2</b> Issuer's employer identification number (EIN)	
Platinum Group Metals Ltd.		None	
<b>3</b> Name of contact for additional information	<b>4</b> Telephone No. of contact	<b>5</b> Email address of contact	
Investor Relations	(604) 899-5450	info@platinumgroupmetals.net	
<b>6</b> Number and street (or P.O. box if mail is not delivered to street address) of contact		<b>7</b> City, town, or post office, state, and ZIP code of contact	
Suite 838-1100 Melville Street		Vancouver, British Columbia, V6E 4A6 Canada	
<b>8</b> Date of action		<b>9</b> Classification and description	
Decemer 13, 2018		Common Shares	
<b>10</b> CUSIP number	<b>11</b> Serial number(s)	<b>12</b> Ticker symbol	<b>13</b> Account number(s)
72765Q882	N/A	NYSEAMCN: PLG; TSX: PTM	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 ▶ On December 13, 2018, Platinum Group Metals Ltd. ("Issuer") undertook a reverse stock split (share consolidation) whereby it consolidated every ten (10) existing common shares into one (1) new common share (the "Consolidation"). No shareholders received a fractional common share, as each fractional share less than 0.5 of a common share was rounded down and each fractional share equal to, or greater than, 0.5 of a common share was rounded up to a whole common share. No cash was received by any shareholder in lieu of a fractional share.

**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 ▶ As a result of the Consolidation, shareholders will be required to allocate the aggregate tax basis to each block of their common shares held immediately prior to the Consolidation among the common shares held immediately after the Consolidation, such that the per-share tax basis in each common share is equal to 1000% of the tax basis in a pre-Consolidation common share.

While the "per-share" tax basis of each shareholder is impacted, the aggregate tax basis of each shareholder's total investment in the Issuer remains unchanged.

**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 post-Consolidation per-share tax basis is equal to the pre-Consolidation aggregate tax basis in each ten (10) common shares held. This results in an increased per-share basis for the fewer shares held.

**Part II Organizational Action** (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ The Issuer believes that the Consolidation should be treated as a tax-free reverse stock split (share consolidation). Consequently, the U.S. federal income tax consequences of the Consolidation to shareholders should be determined under Code Sections 305(a), 307(a), 358(b)(1) and 368(a)(1)(E).

Blank lines for providing details for question 17.

18 Can any resulting loss be recognized? ▶ Provided the Consolidation constitutes a non-taxable transaction, shareholders who receive one (1) new common share in exchange for ten (10) existing common shares of the Issuer should not recognize any loss.

Blank lines for providing details for question 18.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ In general, any gain or loss recognized should be reported by shareholders for the tax year which includes December 13, 2018 (e.g., a calendar year shareholder would report the Consolidation on his or her federal income tax return filed for the 2018 calendar year).

Blank lines for providing details for question 19.

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.

Sign Here

Signature ▶ *Frank Hallam* Date ▶ Dec 13, 2018

Print your name ▶ Frank Hallam Title ▶ Chief Financial Officer

<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	<u>John Hollinrake</u>				<u>P01568530</u>
	Firm's name ▶ <u>Dorsey &amp; Whitney LLP</u>	Firm's EIN ▶ <u>41-0223337</u>			
	Firm's address ▶ <u>Columbia Center, 701 Fifth Avenue, Suite 6100, Seattle, WA 98104</u>	Phone no. <u>(206) 903-8812</u>			