

Tax Basis Information for Distribution of Stock of PJT Partners Inc.

The information contained herein includes a general summary regarding the application of certain U.S. federal income tax laws and regulations relating to the effects of the Distribution (as defined below) on the tax basis of common units of The Blackstone Group L.P. (“Blackstone”) and shares of Class A common stock (“Class A common stock”) of PJT Partners Inc. (“PJT Partners”). The information contained herein does not constitute tax advice and does not purport to be complete or to describe the consequences that may apply to particular categories of Blackstone common unitholders. Blackstone does not provide tax advice to its common unitholders. The example provided below is illustrative and provided as a convenience to Blackstone common unitholders and their tax advisors. You are urged to consult your own tax advisor regarding the particular consequences of the Distribution to you, including the applicability and effect of all U.S. federal, state and local and foreign tax laws. We urge you to read the registration statement on Form 10 of PJT Partners, as filed with the Securities and Exchange Commission on September 3, 2015 (“Form 10”), as amended, in particular the discussion on page 58 of the information statement contained therein under the heading “The Spin-Off—U.S. Federal Income Tax Consequences of the Spin-Off”. You may access the Form 10 at www.sec.gov.

Summary of Transaction

On October 1, 2015, Blackstone distributed to its common unitholders (the “Distribution”) on a pro rata basis shares of Class A common stock of PJT Partners. Each Blackstone common unitholder received 1 share of Class A common stock for every 40 common units owned as of the close of business on September 22, 2015, the record date for the Distribution. No fractional shares of Class A common stock were distributed. Fractional shares of Class A common stock were aggregated and sold on the open market, and the aggregate net proceeds of the sales were distributed ratably in the form of cash payments to Blackstone common unitholders who would otherwise be entitled to receive a fractional share of Class A common stock of PJT Partners in the Distribution.

Effect on Tax Basis of the Distribution

A Blackstone common unitholder’s tax basis in the Class A common stock of PJT Partners received in the Distribution (including any fractional share deemed received) will equal the lesser of (1) Blackstone’s tax basis in such stock immediately before the Distribution or (2) such common unitholder’s tax basis in its common units immediately before the Distribution. Blackstone has calculated that its tax basis in each share of Class A common stock immediately before the Distribution was \$3.809. Each Blackstone common unitholder is responsible for maintaining information regarding its tax basis in its common units.

A Blackstone common unitholder’s tax basis in its Blackstone common units will be reduced (but not below zero) by such common unitholder’s tax basis in the Class A common stock of PJT Partners received in the Distribution (including any fractional share deemed received).

A Blackstone common unitholder will recognize gain or loss equal to the difference between (1) any tax basis allocable to any fractional share of Class A common stock of PJT Partners deemed received in the Distribution and (2) the amount of cash received in lieu of such fractional share.

Example

The following is an example of how to apply the tax basis calculations described above.

Assumptions:

- Blackstone common units owned: 2,000
- The Blackstone common unitholder's tax basis in such common units: \$50,000
- Shares of Class A common stock of PJT Partners received in the Distribution (1 share of PPL Class A common stock for every 40 common units owned): 50

Tax basis calculation for Class A common stock of PJT Partners:

- The Blackstone common unitholder's tax basis in common units (\$50,000) exceeds Blackstone's tax basis in the Class A common stock received by such common unitholder (\$190.45¹). Accordingly, such common unitholder will have an aggregate tax basis in its Class A common stock equal to \$190.45.

Tax basis calculation for Blackstone common units:

- The Blackstone common unitholder's tax basis in its common units (\$50,000) will be reduced (but not below zero) by such common unitholder's tax basis in the Class A common stock (\$190.45) received in the Distribution. Accordingly, such common unitholder will have an aggregate tax basis its common units equal to \$49,809.55².

¹ 50 x \$3.809.

² \$50,000 - \$190.45.