

SERIES A PREFERENCE SHARE DISTRIBUTION

U.S. FEDERAL INCOME TAX CONSIDERATIONS | 2026

SERIES A PREFERENCE SHARE DISTRIBUTION

This information is intended to help answer questions you may have regarding the U.S. federal income tax consequences of our recently announced distribution of one (1) share newly issued 9.0% Fixed Rate Cumulative Perpetual Redeemable Series A Preference Shares (the "Preferred Shares") for every ten (10) common shares (the "Common Shares") of Liberty Latin America Ltd. ("LLA").

Q1: Will I be subject to U.S. federal income tax on the receipt of the distribution of the Preferred Shares?

No. The distribution of the Preferred Shares is expected to be non-taxable for U.S. federal income tax purposes.

Q2: If I am not entitled to receive a full Preferred Share, will I receive a distribution of a fractional Preferred Share?

No. For administrative convenience, LLA will make cash payments to shareholders in lieu of issuing fractional Preferred Shares. A U.S. shareholder generally will recognize taxable gain (or loss) equal to the difference between the amount of cash received and such U.S. shareholder's tax basis that is allocated to the fractional Preferred Share.

Q3: How do I determine my tax basis in the Preferred Shares?

Shareholders are required to allocate the pre-distribution tax basis in their Common Shares among their Common Shares and their Preferred Shares based on their relative fair market values as of the date of the distribution. LLA intends to publish Internal Revenue Service Form 8937 (Report of Organizational Actions Affecting Basis of Securities) on its website within 45 days after the distribution, which will provide further information regarding the suggested ratios for shareholders to use for purposes of allocating their tax basis among the Common Shares and the Preferred Shares.

Q4: What is my holding period in the Preferred Shares?

A shareholder's holding period in the Preferred Shares will include the shareholder's holding period in the Common Shares on which the Preferred Shares were distributed.

Q5: What are the tax consequences to me if I sell the Preferred Shares?

The Preferred Shares are expected to be treated as "Section 306 stock," which means that special rules apply for purposes of determining the U.S. federal income tax consequences of a disposition of the Preferred Shares.

If a shareholder sells or otherwise disposes of the Preferred Shares in a taxable transaction that is not a redemption, then under these special rules, the sale proceeds generally are treated as follows:

1. The sale proceeds are taxed as ordinary income (but taxable to individual U.S. shareholders at preferential capital gain rates) in an amount equal to the lesser of (A) the amount that would have been taxable as a dividend if, in lieu of distributing the Preferred Shares, LLA had distributed cash equal to the fair market value of the Preferred Shares (this amount generally will equal LLA's earnings and profits at the time the Preferred Shares were distributed) or (B) the fair market value of the Preferred Shares at the time the Preferred Shares were distributed;
2. Any sale proceeds in excess of the amount described above are non-taxable to the extent of the shareholder's tax basis in the Preferred Shares; and
3. Any sale proceeds in excess of the shareholder's tax basis in the Preferred Shares are taxed as capital gain.

A shareholder may not recognize a loss under these special rules on a sale or disposition of the Preferred Shares. Any tax basis remaining in the Preferred Shares after the sale or disposition generally will be added to the tax basis in other LLA shares held by such shareholder.

Note, however, that the special rules applicable to Section 306 stock will not apply to a shareholder that completely terminates its ownership in all LLA shares when it disposes of the Preferred Shares. In such case, the shareholder is subject to the normal U.S. federal income tax rules for purposes of calculating its gain or loss on the disposition of Preferred Shares.

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Q6: What is the expected U.S. federal income tax treatment of cash dividends paid on the Preferred Shares?

A cash dividend on the Preferred Shares generally will be taxable to a shareholder as a "dividend" to the extent it is paid out of LLA's current-year or accumulated earnings and profits, as determined for U.S. federal income tax purposes. Distributions in excess of LLA's earnings and profits generally will be non-taxable to the extent of the shareholder's tax basis in the Preferred Shares and thereafter as capital gain.

Individual U.S. shareholders generally will be taxed at preferential capital gain rates on the portion of any distribution that is taxed as a dividend, provided that the Preferred Shares are considered to be readily tradable on an established securities market in the United States (which is expected to be the case) and certain holding period and other requirements are met.

LLA expects to perform an annual earnings and profits calculation for purposes of determining the portion of each distribution that is taxed as a dividend. LLA generally expects to report any such dividends to shareholders annually as required on Internal Revenue Service Form 1099-DIV (Dividends and Distributions).

Illustrative Example

The following example is for illustrative purposes only. Actual amounts will depend on LLA's earnings and profits, the fair market value of the Preferred Shares on the distribution date, your individual tax basis, and the sale price.

Assumptions

- Fair market value (FMV) of one Preferred Share on the distribution date: \$25
- Hypothetical "dividend equivalent" amount (LLA earnings and profits allocable to the share): \$15
- Tax basis allocated to the Preferred Share: \$4
- Later sale price of the Preferred Share: \$27

Application of Assumptions to the 306 Sale Treatment:

- Ordinary-income/Qualified Dividend: \$15, representing the lesser of (A) hypothetical dividend equivalent, or (B) FMV at distribution. So, \$15 of the \$27 sale price is taxed as ordinary income, but at qualified-dividend rates for an individual shareholder.
- Tax-free return of basis: the next \$4 of proceeds is not taxed (it equals the shareholder's \$4 tax basis in the Preferred Share).
- Capital-gains: the remaining \$8 is taxed as capital gain.



IMPORTANT

Please note that this information is provided solely as a convenience to shareholders. LLA does not provide its shareholders with tax advice and the information above is not intended to be tax advice. LLA encourages its shareholders to consult with their tax advisors with respect to their specific questions pertaining to their own tax positions.