

Report of Organizational Actions Affecting Basis of Securities

OMB No. 1545-2224

▶ See separate instructions.

Part I Reporting Issuer			
1 Issuer's name AquaBounty Technologies, Inc.		2 Issuer's employer identification number (EIN) 04-3156167	
3 Name of contact for additional information Christopher Martin	4 Telephone No. of contact (978) 648-6050	5 Email address of contact cmartin@aquabounty.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 2 Mill & Main Place, Suite 395		7 City, town, or post office, state, and Zip code of contact Maynard, MA 01754	
8 Date of action January 5, 2017		9 Classification and description Common Stock - Reverse Stock Split	
10 CUSIP number U0387J108	11 Serial number(s)	12 Ticker symbol AQB	13 Account number(s)

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 January 5, 2017, the Issuer implemented a one-for-thirty reverse stock split that reduced the number of outstanding common shares from 193,915,210 to 6,463,935.

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 ▶ The number of shares of common stock held by each shareholder were reduced by dividing the number of shares held immediately before the reverse stock split by the one-for-thirty exchange ratio. The holdings of each shareholder were aggregated for purposes of calculating the reverse split, with any resulting fractional share rounded up to the next whole share.

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 ▶ Each shareholder's aggregate tax basis remains unchanged after the reverse stock split. The allocation of basis to each individual share should be done in accordance with Section 358 of the Internal Revenue Code. Please consult your tax advisor.

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 tax treatment of the Issuer's reverse stock split is determined pursuant to Sections 368(a)(1)(E) and Section 354(a)(1) of the Internal Revenue Code. Shareholder basis is determined pursuant to Section 358 of the Internal Revenue Code.

18 Can any resulting loss be recognized? ▶ Shareholders will not recognize gain or loss as a result of the reverse stock split.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶

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 ▶ Christopher A. Martin Date ▶ February 13, 2017

Print your name ▶ Christopher Martin

Title ▶ General Counsel

Paid Preparer Use Only

Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
Joseph F. Burnett		2/13/17	<input type="checkbox"/>	ON FILE
Firm's name ▶	Firm's address ▶		Firm's EIN ▶	Phone no.
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