

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name Vivendi SE		2 Issuer's employer identification number (EIN)	
3 Name of contact for additional information Xavier Le Roy	4 Telephone No. of contact +33 1 71 71 18 77	5 Email address of contact xavier.leroy@vivendi.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 42 Avenue de Friedland		7 City, town, or post office, state, and ZIP code of contact Paris Cedex 08, 75380 France	
8 Date of action 09/23/2021	9 Classification and description Ordinary Shares		
10 CUSIP number F 70 63 C 11	11 Serial number(s)	12 Ticker symbol VIV	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 September 23, 2021, Vivendi SE ("Vivendi") distributed one (1) share of Universal Music Group N.V. ("UMG") stock for every one (1) share of Vivendi stock held by its shareholders as of September 22, 2021 (the "Distribution").**

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 receipt of the UMG shares by Vivendi shareholders is expected to be taxable for U.S. federal income tax purposes. The shareholders' basis in the UMG shares received should be equal to the fair market value of the shares received.**

Vivendi assumes that all of this Distribution is treated as a dividend for U.S. federal income tax purposes because Vivendi does not currently have, and has not historically calculated, its current and accumulated earnings and profits for U.S. federal tax rules and as a result holders should treat the entire distribution as a dividend under section 316 of the Code. (The receipt should not result in an adjustment to a holder's U.S. tax basis in their Vivendi shares.)

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 ▶ **There is no direct guidance under U.S. federal income tax law as to the proper approach or method for determining the fair market value of shares of UMG received in the Distribution. In general, for U.S. federal income tax purposes, fair market value is the price at which property would change hands between a willing buyer and a willing seller, neither being under any compulsion to buy or sell and both having reasonable knowledge of the facts.**


Vivendi believes that one possible approach to determining the fair market value of the common share of UMG for this purpose (as well as other purposes) is to look to the opening price on September 21, 2021 when trading on the UMG shares became available. Other values may be more appropriate. Vivendi recommends that each person who received an UMG share in the Distribution consult with its own tax advisor to determine the fair market value of the shares received in the Distribution.

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ Sections 301(c), 312 & 316

18 Can any resulting loss be recognized? ▶ Not applicable.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The reportable tax year is the tax year ending December 31, 2021.

Sign Here	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.			
	Signature ▶ <u></u>	Date ▶ <u>21 / 12 / 2021</u>		
Paid Preparer Use Only	Print your name ▶ <u>Bernard Bacci</u>	Preparer's signature	Title ▶ <u>SVP Head of Taxes</u>	Check <input type="checkbox"/> if self-employed
	Print/Type preparer's name		Date	PTIN
	Firm's name ▶		Firm's EIN ▶	
	Firm's address ▶		Phone no.	