(December 2011) Department of the Treasury Internal Revenue Service

Report of Organizational Actions Affecting Basis of Securities

► See separate instructions.

OMB No. 1545-2224

Part I	Reporting	Issuer			
1 Issuer's	s name				2 Issuer's employer identification number (EIN)
Caledonia	Mining Corpora	ation Plc			None
		ditional information	4 Telepho	ne No. of contact	5 Email address of contact
					30° 30° 30° 30° 30° 30° 30° 30° 30° 30°
Investor Re				+44 1534 679800	info@caledoniamining.com
6 Numbe	r and street (or i	P.O. box if mail is not	delivered to	street address) of contact	7 City, town, or post office, state, and Zip code of contact
	Weignbridge He	ouse			Weignbridge, St. Helier, Jersey JE2 3NF
8 Date of	action		9 Clas	ssification and description	
luma 20, 20	147				
June 26, 20 10 CUSIP		11 Serial number(on Shares: Share Consolidation 12 Ticker symbol	13 Account number(s)
		TT Containanteory	٧,	12 Honer Symbol	13 Account number(s)
G17	757E113	N/A		NYSE Americ: CMCL TSE: CAL	N/A
Part II			h addition	al statements if needed. See bad	ck of form for additional questions.
14 Desci	ribe the organiza	ational action and, if a	oplicable, th	ne date of the action or the date aga	inst which shareholders' ownership is measured for
	· · · · · · · · · · · · · · · · · · ·				

			VIII CAN ST		August 1997
15 Desci	ribe the quantita	tive effect of the orga	inizational a	ction on the basis of the security in t	the hands of a U.S. taxpayer as an adjustment per
snare	or as a percent	age of old basis > A	Board Lot S	Shareholder will determine its tax	basis in each common share of Caledonia held
after the 1-	for-100 share c	consolidation by allo	cating such	Board Lot Shareholder's aggregation	ate tax basis in its common shares of Caledonia
held imme	diately after the	share consolidatio	n. Specifica	lly, a Board Lot Shareholder's tax	basis in each post-1-for-100 share consolidation
common s	nare will be det	ermined by multiply	ing the tax	basis in each one (1) common sha	are of Caledonia held immediately before the
Caladania	hald after the 2	tion by one nundred	(100). A BC	pard Lot Shareholder will then det	ermine its tax basis in each common share of
immediatel	v after the char	re dividend Specific	na by aiviai	ng such Board Lot Shareholder's	tax basis in each Caledonia common share held
will be dete	ermined by divi	ding the tax basis in	each one	1) common share of Caladonia ha	each post-20-for-1 share dividend common shares eld immediately before the 20-for-1 share dividend
by twenty ((20), and adding	g to it the proportion	ate amount	of any tax basis that would other	wise have been allocated to a fractional share if
		been received.	ato amount	or any tax basis that would belief	Wise have been anocated to a fractional share if
					A STATE OF THE STA
16 Desci	ribe the calculat	ion of the change in b	asis and the	e data that supports the calculation,	such as the market values of securities and the
valua	uon dates > A E	Board Lot Sharehold	er's per sha	are tax basis in each newly acquir	ed common share of Caledonia following the share
consolidati	ion is 10,000%	of that Board Lot Sh	areholder's	per share tax basis immediately	prior to the 1-for-100 share consolidation. A Board
Lot Shareh	older's per sha	re tax basis in each	newly acqu	ired common share of Caledonia	following the share dividend is 5% of that Board
would other	older's per sha	re tax basis immedi	ately prior t	to the 20-for-1 share dividend, plu	s the proportionate amount of any tax basis that
Shareholde	ar's ner share t	av hacis was \$1 00 i	ofore the	hare Consolidation the next the	n received. For example, if a Board Lot tax basis would be \$100 immediately after the
share cons	olidation. The	Board Lot Sharehold	ter's nor ch	are tay hasis would then he er i-	mediately after the share dividend, plus
the proport	tionate amount	of any tax basis the	t would have	e been allocated to a fractional of	hare if such fractional share had been received.
			Trouba Hat	to a fractional si	nare in such machorial share had been received.
For Danara	work Daduction	Ant Notice age the	nonquete la		- 0007

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Part II Organizational Action (continued)	
17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ Caledonia believes the Share Consolidation should be treated as a single, integrated transaction which should qualify as a recapitalization within the meaning Code Section 368(a)(1)(E). Consequently, the U.S. federal income tax consequences of the Share Consolidation for Board Lot Sharehold should be determined under Code Sections 368(a), 354(a), and 358(a).	of
18 Can any resulting loss be recognized? ► <u>Because the Share Consolidation should qualify as a recapitalization within the meaning of Code Section 368(a), each Board Lot Shareholder should not recognize any loss in connection with the Share Consolidation.</u>	of
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 Board Lot Shareholders for the tax year which includes June 26, 2017 (e.g., a calendar year Board Lot Shareholder would report the Share Consolidation on his or her federal income tax return filed for the 2017 calendar year).	t
State Totals Would report the Share Consolidation on his of her rederal income tax return filed for the 2017 calendar year).	
Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowled 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	lge and
Print your name ▶ Adam Chester Title ▶ General Counsel, Company Secreta	ary
Print/Type preparer's name Preparer's signature Date 3Avg 2517 Check ☐ if self-employed Print/Type preparer's name Possey & Whitney LLP Print/Type preparer's name Possey & Whitney LLP Print/Type preparer's name Preparer's signature 3Avg 2517 Check ☐ if self-employed Print/Type preparer's name Print/Type preparer's name Print/Type preparer's name Preparer's signature The print/Type preparer's name Preparer's signature Print/Type preparer's name Preparer's signature The print/Type preparer's name Preparer's signature Print/Type preparer's name Preparer's signature Print/Type preparer's name Print/Type preparer's name Print/Type preparer's name Preparer's signature Print/Type preparer's name Preparer's signature Print/Type preparer's name Print	
Firm's address ► Columbia Center, 701 Fifth Avenue, Suite 6100, Seattle, WA 98104 Phone no. (206) 903-8: Send Form 8937 (Including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054	812

Insert A

On June 19, 2017, the Shareholders of Caledonia Mining Corporation Plc ("Caledonia") approved a 1-for-100 share consolidation of Caledonia's common shares and, immediately thereafter, a 20-for-1 share dividend (by way of a division) of Caledonia's common shares (together, the "Share Consolidation"), effective upon the alteration of Caledonia's memorandum of association. Such alteration of Caledonia's memorandum of association was filed as of June 26, 2017. As a net result of the Share Consolidation, each five pre-arrangement Caledonia common shares outstanding were automatically combined into one new Caledonia common share without any action on the part of any shareholder.

No fractional shares were issued in connection with the Share Consolidation. "Non-Board Lot Shareholders" (shareholders holding less than 100 Caledonia common shares immediately prior to the Share Consolidation) entitled to a fractional Caledonia common share with a fair market value in excess of £5.00 immediately prior to the share dividend were entitled to receive cash in lieu thereof. Fractional Caledonia common shares with a fair market value of £5.00 or less immediately prior to the share dividend which were otherwise distributable to Non-Board Lot Shareholders were cancelled by Caledonia and no cash was distributed in lieu thereof.

"Board Lot Shareholders" (shareholders holding 100 or more Caledonia common shares immediately prior to the Share Consolidation) entitled to a fractional Caledonia common share with a fair market value of £5.00 or less after the Share Consolidation received the nearest whole number of Caledonia common shares, rounding down. No Board Lot Shareholders were entitled to a fractional Caledonia common share with a fair market value in excess of £5.00 after the Share Consolidation and therefore no cash was distributed in lieu thereof.

The Share Consolidation is described in further detail in the Caledonia Management Information Circular and Solicitation of Proxies dated May 23, 2017 (the "Circular"), which is available at www.sec.gov.

This Form does not further address Non-Board Lot Shareholders. Non-Board Lot Shareholders should consult their own tax advisors regarding the U.S. tax consequences of the Share Consolidation in light of their particular circumstances.