

Report of Organizational Actions Affecting Basis of Securities

OMB No. 1545-0123

► See separate instructions.

Part I Reporting Issuer

1 Issuer's name		2 Issuer's employer identification number (EIN)	
Greene County Bancorp, Inc.		14-1809721	
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact	
Michelle M. Plummer	518-943-2600 ext. 2007	michellep@tbogc.com	
6 Number and street (or 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	
302 Main Street, PO Box 470		Catskill, NY 12414	
8 Date of action	9 Classification and description		
03/23/23	Common Stock Dividend (2-for-1 stock split)		
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)
394357107		GCBC	

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 March 23, 2023 Greene County Bancorp, Inc. effected a 2-for-1 stock split in the form of a stock dividend on its outstanding shares of common stock. The stock split was paid on March 23, 2023 to stockholders of record as of March 8, 2023.

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 stock split is a non-taxable transaction under Internal Revenue Code ("IRC") Section 305(a).

As a result of the 2-for-1 stock split, shareholders will receive one additional share for each share owned. In accordance with IRC Section 307(a), each shareholder is required to allocate the aggregate tax basis in the shares held immediately prior to the 2-for-1 stock split amount the shares of stock held immediately after the 2-for-1 stock split. The number of shares held by each shareholder are multiplied by 2. After the transaction, a shareholder will multiply the basis in each share of stock held before the stock split by 1/2 to determine the basis in each share of the stock held after the stock split. Thus, each shareholder's total basis in all shares owned after the 2-for-1 stock split and the proportionate interest in Greene County Bancorp, Inc. remains the same.

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 ►

We caution that this is not tax advice and is provided only as guidance. Investors should consult their tax advisory if they have questions. A Shareholder will multiply the basis in each share held before the stock split by 1/2 to determine share basis, after the stock split, in the original share owned as well as in the one additional share distributed in the stock split. The record date for the stock split is March 8, 2023, the payable date is March 23, 2023, with new shares distributed on March 24, 2023. The data that supports this calculation is each shareholder's basis immediately before the distribution and the number of shares issued 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 ►

Tax treatment for the 2-for-1 stock split is based upon Sections 305(a) and 307(a) of the Internal Revenue Code.

18 Can any resulting loss be recognized? ►

Under current law for U.S. Federal income tax purposes, there will be no U.S. taxable income, gain or loss realized by U.S. resident shareholders in connection with the 2-for-1 stock split.

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

**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 ► Michelle Plummer

Date ► 3/29/2023

Print your name ► **Michelle M. Plummer**

Title ► **SEVP, CFO & COO**

**Paid
Preparer
Use Only**

Print/Type preparer's name

Preparer's signature

Date

Check ☐ if
self-employed PTIN

Firm's name ►

Firm's EIN ►

Firm's address ►

Phone no.

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054