

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

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|-----------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|----------------------|
| 1 Issuer's name Johnson Controls International plc (as successor to Tyco International plc) | | 2 Issuer's employer identification number (EIN) 98-0390500 | |
| 3 Name of contact for additional information Johnson Controls Shareholder Services | 4 Telephone No. of contact Toll Free: 1-800-524-6220; Toll: +1 414 524-2 | 5 Email address of contact shareholder.services@jci.com | |
| 6 Number and street (or P.O. box if mail is not delivered to street address) of contact 1 Albert Quay | | 7 City, town, or post office, state, and Zip code of contact Cork, Ireland | |
| 8 Date of action September 2, 2016 | | 9 Classification and description Stock - Recapitalization | |
| 10 CUSIP number G91442106 | 11 Serial number(s) | 12 Ticker symbol TYC | 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 2, 2016, Tyco International plc underwent a share consolidation in which Tyco International plc shareholders received 0.955 ordinary shares of Tyco International plc for each Tyco International plc ordinary share held (the "consolidation"). The consolidation was intended to qualify as a reorganization under section 368 of the Internal Revenue Code of 1986, as amended. As a result, Tyco International plc shareholders will not recognize gain or loss, except with respect to cash received in lieu of a fractional ordinary share of Tyco International plc.**

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 ▶ **Each Tyco International plc shareholder will generally take an aggregate basis in the Tyco International plc shares received pursuant to the consolidation (including any fractional shares deemed received) that is equal to the aggregate basis in such shareholder's Tyco International plc ordinary shares immediately prior to the consolidation. Tyco International plc shareholders that acquired different blocks of Tyco International plc ordinary shares at different times or at different prices should consult their tax advisors regarding the allocation of basis of such shares to particular ordinary shares received in the consolidation. In addition, certain holders of Tyco International plc that received cash in lieu of fractional shares in the consolidation will be treated as if they had received such fractional shares and then sold them for cash.**

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 ▶ **N/A. See item 15.**

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 368(a)(1)(E), 354, 358 and 1001.

18 Can any resulting loss be recognized? ▶ No, except with respect to cash received in lieu of a fractional share.
Certain holders of Tyco International plc shares who received cash in lieu of a fractional Tyco International plc ordinary share can recognize capital loss in an amount equal to the difference between (i) the amount of cash received in lieu of such fractional Tyco International plc ordinary share and (ii) the portion of such holder's aggregate basis in the Tyco International plc ordinary share surrendered that is allocable to such fractional share.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The share consolidation is reportable by each Tyco International plc shareholder in their tax year that includes September 2, 2016.

Tyco International plc shareholders are urged to consult their own tax advisors with respect to the particular tax consequences of the share consolidation to them, including the applicability and effect of all U.S. federal, state and local tax laws and foreign tax laws. The information contained in this document does not constitute tax advice. For more information, please refer to the definitive joint proxy statement/prospectus filed by Tyco International plc and Johnson Controls, Inc. with the SEC on July 6, 2016, noting especially the discussion under the heading "Certain Tax Consequences of the Merger—U.S. Federal Income Tax Considerations—U.S. Federal Income Tax Consequences of the Tyco Share Consolidation to Tyco Shareholders."

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 ▶ Steve Jarowski Date ▶ 10.12.16

Print your name ▶ Steve Jarowski Title ▶ VP-Tax

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| Paid Preparer Use Only | Print/Type preparer's name | Preparer's signature | Date | Check <input type="checkbox"/> if self-employed | PTIN |
| | Firm's name ▶ | | | | Firm's EIN ▶ |
| | Firm's address ▶ | | | | Phone no. |