

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ See attachment

18 Can any resulting loss be recognized? ▶ See attachment

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

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 ▶ *Helen Oh* Date ▶ 1-14-2020

Print your name ▶ Helen Oh Title ▶ VP - Tax

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.			

ARES MANAGEMENT CORPORATION ("ARES")

Attachment to IRS Form 997

Date of Organization Action: March 29, 2019, June 28, 2019, September 30, 2019, December 31, 2019

Return of Capital Distributions

CUSIP Number 03990B 101; Symbol ARES

DISCLOSURE REGARDING TAX ADVICE: The information contained herein does not constitute tax advice and does not purport to be complete or describe the consequences that may apply to all common shareholders. Shareholders are advised to consult their own tax advisor regarding the adjustment to basis.

Part II Box 14

Ares Management Corporation paid the following cash distributions to common shareholders of record as of the Record Dates below:

Record Date	Payment Date	Distribution / Share
March 15, 2019	March 29, 2019	\$0.32
June 14, 2019	June 28, 2019	\$0.32
September 16, 2019	September 30, 2019	\$0.32
December 17, 2019	December 31, 2019	\$0.32

Part II Box 15

The above distributions are treated as a taxable dividend to the extent of the Company's current and accumulated earnings and profits as of the period ending December 31, 2019. Distributions in excess of the Company's current and accumulated earnings and profits are treated as a nontaxable return of capital to the extent of the shareholder's tax basis. Any distribution in excess of the common shareholder's tax basis will be treated as capital gain for U.S. tax purposes. We currently estimate that the following amounts will reduce a common shareholder's basis.

Distribution Date	Per Share Reduction in Basis
March 29, 2019	\$0.07
June 28, 2019	\$0.07
September 30, 2019	\$0.07
December 31, 2019	\$0.09

Part II Box 16

Pursuant to Internal Revenue Code Section 301(c) and 316(c), the taxability of Ares Management Corporation's distributions is calculated based on the earnings and profits of Ares Management Corporation and its wholly owned subsidiary, Ares Holdings, Inc. The calculation of earnings and profits differs from income calculated in accordance with GAAP and non-GAAP metrics used in segment

reporting (fee related earnings & realized income) since it is based on taxable income which includes certain non-cash tax deductions, among other differences. The estimated 2019 current and accumulated earnings and profits support Ares Management Corporation's disclosures above.

The reduction in basis does not reflect changes in Ares Management Corporation's GAAP income or segment results and does not have any impact on the Company's dividend policy (which is based on after-tax fee related earnings) or its ability to pay dividends to stockholders.

Part II Box 17

IRC Section 301(c) and IRC Section 316(a)

Part II Box 18

N/A

Part II Box 19

The return of capital calculated in Item 15 above is an estimate based on the most current and accurate available information at the time this Form was published. Ares Management Corporation will report an updated Form 8937 upon the filing of the 2019 federal income tax return, if it determines that the amount of distributions treated as a return of capital with respect to each common share changes. The above information does not constitute tax advice. It is recommended that shareholders consult with their own legal, financial or tax advisors regarding the income tax consequences of reporting amounts that may be revised at a later date.