

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name Seadrill Partners LLC		2 Issuer's employer identification number (EIN) 66-0789360	
3 Name of contact for additional information John Roche	4 Telephone No. of contact +44 20 8811 4700	5 Email address of contact ir@seadrill.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 2nd Floor, Building 11, Chiswick Business Park, 566 Chiswick High Rd		7 City, town, or post office, state, and Zip code of contact London, W4 5YS, United Kingdom	
8 Date of action See Part II, Line 14		9 Classification and description Units	
10 CUSIP number Y7545W109	11 Serial number(s)	12 Ticker symbol SDLP	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 ▶ During calendar year 2015, Seadrill Partners LLC declared and paid the following distributions to the unit holders, of which 83.73% should be treated as a return of capital:

Ex-Dividend Date	Record Date	Payment Date	Total Distribution per Unit
02/04/2015	02/06/2015	02/13/2015	\$0.5675
05/05/2015	05/07/2015	05/14/2015	\$0.5675
08/05/2015	08/07/2015	08/14/2015	\$0.5675
11/04/2015	11/06/2015	11/13/2015	\$0.5675

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 ▶ Seadrill Partners LLC determined that the distributions described above should be treated in part as a taxable dividend and in part as a return of capital that would reduce the basis of the unit holders' stock. To the extent that the return of capital exceeds the tax basis of the shareholders' units, it should be treated as a capital gain.

Ex-Dividend Date	Record Date	Payment Date	Total Distribution per unit	Taxable Dividend per unit	Return of Capital per unit
02/04/2015	02/06/2015	02/13/2015	\$0.5675	\$0.0923	\$0.4752
05/05/2015	05/07/2015	05/14/2015	\$0.5675	\$0.0923	\$0.4752
08/05/2015	08/07/2015	08/14/2015	\$0.5675	\$0.0923	\$0.4752
11/04/2015	11/06/2015	11/13/2015	\$0.5675	\$0.0923	\$0.4752

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 ▶ The distributions declared and paid (as described above) were treated as a return of capital to the extent that they exceeded current and accumulated earnings and profits.

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ IRC §§ 301, 316

18 Can any resulting loss be recognized? ▶ N/A

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ N/A

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 ▶ A signed copy is maintained by the issuer Date ▶ _____

Print your name ▶ _____ Title ▶ _____

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.	

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