



GABRIEL  
*Rosia Montana*  
IN PARTNERSHIP

**GABRIEL RESOURCES LTD**  
c/o RM Gold (Services) Ltd.  
1 Central Court  
25 Southampton Buildings  
London WC2A 1AL  
United Kingdom

### PFIC Annual Information Statement

1. This Information Statement applies to the taxable year of **Gabriel Resources Ltd.** ("**Gabriel**") beginning on January 1, 2019 and ending on December 31, 2019.
2. Ordinary earnings and net capital gains of Gabriel for the taxable year ended **December 31, 2019** and number of outstanding shares as at **December 31, 2019** are as follows:

Ordinary earnings	<b>Nil</b>
Net capital gain	<b>Nil</b>
Number of outstanding shares	<b>574,246,496</b>

Based on the information provided above you may determine the pro-rata share of ordinary earnings and net capital gains, as defined in Treasury Regulation Section 1.1293-1(a)(2), attributable to your shareholding in **Gabriel**.

3. The total amounts of cash and fair market value of other property distributed or deemed distributed to respective shareholders during the taxable year specified in paragraph (1) by Gabriel is as follows:

Cash	<b>Nil</b>
Fair market value of property	<b>Nil</b>

4. **Gabriel** will permit its shareholders to inspect and copy permanent books of account, records, and such other documents in respect of **Gabriel**, as may be maintained by **Gabriel** that are necessary to establish that PFIC ordinary earnings and net capital gain, as provided in section 1293(e) of the Code, are computed in accordance with U.S. income tax principles.

Richard Brown  
Chief Financial Officer, Gabriel Resources Ltd.  
May 18, 2020