



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, 2018 and ending on December 31, 2018.
2. Ordinary earnings and net capital gains of Gabriel for the taxable year ended **December 31, 2018** and number of outstanding shares as at **December 31, 2018** are as follows:

Ordinary earnings	Nil
Net capital gain	Nil
Number of outstanding shares	465,155,255

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	Nil
Fair market value of property	Nil

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.

Max Vaughan
Chief Financial Officer, Gabriel Resources Ltd.
April 26, 2019