



This statement is provided for shareholders of Rua Gold Inc. (“the Company”) who are United States persons for purposes of the U.S. Internal Revenue Code of 1986 (“the Code”), as amended and the regulations thereunder and are required to file a United States income tax return. It is not relevant to other shareholders.

Pursuant to the requirements of Treasury Regulation §1.1295-1(g)(1), the attached PFIC Annual Information Statement is being made available to U.S. shareholders who have made or intend to make a QEF Election. The attached PFIC Annual Information Statement contains information to enable you or your tax advisor to prepare your tax return if you make the QEF Election.

A U.S. shareholder who makes a QEF Election is required to annually include in income the pro rata share of the ordinary earnings and net capital gains of the Company. The QEF Election is made by completing and attaching Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund (Form 8621) to your timely-filed federal income tax return.

THIS INFORMATION IS PROVIDED IN ORDER TO ASSIST U.S. SHAREHOLDERS IN MAKING CALCULATIONS AND DOES NOT CONSTITUTE TAX ADVICE. WE STRONGLY URGE U.S. SHAREHOLDERS TO CONSULT WITH THEIR OWN TAX ADVISOR TO DETERMINE WHETHER THEY ARE SUBJECT TO U.S. FEDERAL INCOME TAX, AND IF SO, WHETHER THEY ARE ELIGIBLE TO MAKE ANY APPLICABLE ELECTIONS PERTAINING TO THE COMPANY’S STATUS AS A PFIC. ANY DECISION TO MAKE OR NOT MAKE ANY ELECTION THAT MAY BE AVAILABLE WILL DEPEND UPON A U.S. SHAREHOLDER’S PARTICULAR TAX SITUATION AND MAY HAVE SIGNIFICANT AND CONTINUING U.S. TAX CONSEQUENCES. THE COMPANY IS UNABLE TO GIVE ADVICE IN THIS REGARD.



2024 PFIC Annual Information Statement

Rua Gold Inc. (the “Company”) is providing the following information to you in order to assist you in the preparation of Internal Revenue Service (“IRS”) Form 8621 should you or your tax advisor deem such form necessary. This statement does not constitute tax advice.

1. This Information Statement applies to the taxable year of the Company beginning on January 1, 2024 and ending on December 31, 2024.
2. Each shareholder has the following pro rata share of the ordinary earnings and net capital gain of the Company for the taxable year is as follows:

Net Ordinary Earnings:	Nil
Net Capital Gains:	Nil

3. The amount of cash and fair market value of other property distributed or deemed distributed by the Company to each shareholder of the Company during the taxable year is as follows:

Cash:	Nil
Fair Market Value of Property:	Nil

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

Rua Gold Inc.

“Zeenat Lokhandwala”

Zeenat Lokhandwala

Chief Financial Officer