

Attention: U.S. Shareholders of EverArc Holdings Limited

Date: February 18, 2022

Re: PFIC Annual Information Statement for the period ended October 31, 2021

Because EverArc Holdings Limited (the “Company”) is a British Virgin Islands corporation and has passive income and passive assets, it is anticipated that the Company meets the definition of a passive foreign investment company (“PFIC”) under Section 1297 of the Internal Revenue Code of 1986, as amended (the “Code”) for its 2021 taxable year. Certain U.S. income tax consequences flow from this designation and these consequences may be mitigated by the U.S. shareholder electing to treat the foreign corporation as a “qualified electing fund” (“QEF”) under Section 1295 of the Code.

The Company is expected to be a PFIC for its 2021 taxable year. The Company is providing the attached PFIC Annual Information Statement pursuant to the requirements of Treasury Regulation 1.1295-1(g)(1). The PFIC Annual Information Statement contains information to enable you or your tax advisor to prepare your tax return if you elect to treat the Company as a QEF.

A U.S. shareholder who makes a QEF election is required to annually include in one’s income one’s pro rata share of the ordinary earnings and net capital gains for the Company. The QEF election is made by attaching IRS Form 8621 to your federal income tax return filed by the due date of the return, as extended.

WE RECOMMEND U.S. SHAREHOLDERS CONSULT WITH THEIR TAX ADVISORS REGARDING ANY DECISION TO MAKE (OR REFRAIN FROM MAKING) ANY ELECTION THAT MAY BE AVAILABLE TO THEM BECAUSE ANY SUCH DECISION WILL DEPEND UPON THEIR OWN PARTICULAR TAX SITUATION AND MAY HAVE SIGNIFICANT AND CONTINUING U.S. TAX CONSEQUENCES. THE COMPANY IS UNABLE TO GIVE ADVICE IN THIS REGARD.



EverArc Holdings Limited

PASSIVE FOREIGN INVESTMENT COMPANY (“PFIC”) 2021 ANNUAL INFORMATION STATEMENT

The Information Statement is provided for shareholders who are United States persons. In order to assist you in preparation of Form 8621, we provide the following information:

1. Pursuant to United States Treasury Regulation Section 1.1295-1(g)(1), EverArc Holdings Limited (the “Company”), hereby represents that, to the best of its knowledge,
 - a. This information statement applies to the taxable year of the Company beginning on November 1, 2020 and ending on October 31, 2021 (the “Taxable Year”).
 - b. The per unit amounts of ordinary earnings and net capital gains for each ordinary share of the Company for the period November 1, 2020 through October 31, 2021 are provided in the chart below.

Name	Ordinary Earnings (USD)	Net Capital Gains (USD)
EverArc Holdings Limited	\$0.003156407273618	\$0.00000000000

To determine your pro-rata share of the amounts above, multiply the amounts by the number of each share you held during the year.

- i. If you owned the same number of units starting from November 1, 2020 through October 31, 2021, multiply the number of such units by the amounts above.
 - ii. If you did not own the same number of units from November 1, 2020 through October 31, 2021, multiply the number of units you owned by the amounts above as well as by the number of days the units were held during this time period and divide the result by 365.
- c. Your pro-rata share of cash distributions and property distributions for each ordinary share of the Company for the period specified in paragraph 1a above are as follows:

Series	Cash Distributions (USD)	Property Distributions (USD)
Ordinary Share	\$0.00000000000	\$0.00000000000

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 the 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. federal income tax principles, and to verify these amounts and the shareholder’s pro rata shares thereof.



Tracy Britt Cool

Tracy Britt Cool

Director

EverArc Holdings Limited

Kingston Chambers

P.O. Box 173

Road Town, Tortola, British Virgin Islands

Date: February 18, 2022

THIS INFORMATION IS PROVIDED IN ORDER TO ASSIST THOSE SHAREHOLDERS WHO HAVE MADE A QEF ELECTION WITH RESPECT TO EVERARC HOLDINGS LIMITED IN MAKING CERTAIN PFIC CALCULATIONS AND DOES NOT CONSTITUTE TAX ADVICE. THOSE SHAREHOLDERS ARE ADVISED TO CONSULT THEIR OWN TAX ADVISORS CONCERNING THE OVERALL TAX CONSEQUENCES OF THE OWNERSHIP OF SHARES ARISING IN THEIR OWN PARTICULAR SITUATIONS UNDER UNITED STATES FEDERAL, STATE, LOCAL AND FOREIGN LAW.

