



PFIC Annual Information Statement

This information statement is provided for the convenience of any US shareholder who held shares in Sabina Gold & Silver Corp. ("Sabina") when Sabina was a passive foreign investment company ("PFIC") and had a QEF election in effect, in connection with their preparation of US Internal Revenue Service Form 8621.

- 1) This Information Statement applies to the taxable year of Sabina beginning January 1, 2020 and ending on December 31, 2020.
- 2) The shareholder's pro-rata share (per share) of the ordinary earnings and net capital gain of Sabina for the taxable year of Sabina specified in paragraph (1) is USD \$nil/share of ordinary income and USD \$nil/share of net capital gain.
- 3) The amount of cash and the fair market value of other property distributed to the shareholder during the taxable year of Sabina in paragraph (1) is USD \$nil.
- 4) Sabina will permit the shareholder to examine Sabina's permanent books of account, records, and such other documents as may be maintained by Sabina that are necessary to establish that PFIC ordinary earnings and net capital gain, as defined in section 1293(e) of the Code, are computed in accordance with U.S. income tax principles and to verify these amounts and the shareholder's pro rata share thereof.

Sabina Gold & Silver Corp.

A handwritten signature in black ink, appearing to read "Elaine Bennett", is written over a horizontal line.

Elaine Bennett
VP Finance & CFO
February 10, 2021

THIS INFORMATION IS PROVIDED IN ORDER TO ASSIST SHAREHOLDERS IN MAKING CALCULATIONS AND DOES NOT CONSTITUTE TAX ADVICE. SHAREHOLDERS ARE URGED TO CONSULT THEIR OWN TAX ADVISORS CONCERNING THE OVERALL TAX CONSEQUENCES OF THE OWNERSHIP OF SABINA ARISING IN THEIR OWN PARTICULAR SITUATIONS UNDER UNITED STATES FEDERAL, STATE, LOCAL OR FOREIGN LAW.

