



## PH&N Small Float Fund - Series O

PFIC Annual Information Statement for the year ended June 30, 2020

### PFIC INFORMATION

#### IMPORTANT TAX NOTICE TO U.S. UNITHOLDERS OF FUND

This statement is provided for unitholders who are United States persons for purposes of the U.S. Internal Revenue Code of 1986, as amended ("Code") and the regulations thereunder. It is not relevant to other unitholders. United States persons include U.S. citizens (whether or not they are U.S. residents), certain individuals with U.S. permanent resident status, U.S. corporations, and certain U.S. trusts and estates. Investors in the Fund should consult with a U.S. tax professional to determine whether they are United States persons.

The Fund may be deemed to be classified as a Passive Foreign Investment Company ("PFIC") as defined in Code Section 1297(a) for its U.S. tax year ended June 30, 2020.

The attached PFIC Annual Information Statement is being provided pursuant to the requirements of Treasury Regulation Section 1.1295-1(g)(1). The PFIC Annual Information Statement contains information to enable you, should you so choose based on the advice of your tax advisors in light of your personal tax circumstances, to elect to treat the Fund as a qualified electing fund ("QEF") for its U.S. tax year ended June 30, 2020. Investors are generally required to report QEF elections for PFICs having tax years that end during or on the same date as their own U.S. tax year-end.

A U.S. unitholder who makes a QEF election is required to annually include in his or her income his or her pro-rata share of the ordinary earnings and net capital gain of the Fund, whether or not that fund distributes any amounts to its shareholders. While the choice of whether the QEF election is appropriate for you will depend on your personal circumstances, please note that the QEF election is the only way that appreciation in the value of the Fund can be eligible for U.S. taxation at the more favorable capital gains rates.

The QEF election is generally made on Form 8621 ("Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund") on or before the due date, including extensions, for the income tax return with respect to the tax year to which the election relates. Unitholders who are U.S. persons are required to report their holdings of the Fund on Form 8621 whether or not they make the QEF election. Where a U.S. person is a unitholder in a Fund that holds other RBC Funds in its portfolio, that person is an indirect investor in the lower-tier funds and is required to file a separate Form 8621 report for each of the lower-tier funds. The attached information is designed to enable a unitholder to make a QEF election for both directly held top-tier and indirectly held lower-tier funds.

This information is provided in order to assist unitholders in making calculations and does not constitute tax advice. The U.S. tax laws regarding PFICs are extremely complex and unitholders are advised to consult their own tax advisors concerning the overall tax consequences of their respective investment in, and ownership of units of the Fund under United States federal, state, local and foreign law.

Further information on PFIC rules and the QEF election is available from the Internal Revenue Service, including the following website pages: [www.irs.gov/instructions/i8621/ch01.html](http://www.irs.gov/instructions/i8621/ch01.html).

## PH&N Small Float Fund - Series O

PFIC Annual Information Statement for the year ended June 30, 2020

(1) This Information Statement applies to the taxable year of PH&N Small Float Fund commencing on July 1, 2019 and ending on June 30, 2020.

(2) The pro-rata per-unit per-day shares of the ordinary earnings and net capital gain of these funds for the period specified in paragraph (1), and the per-unit amounts distributed by PH&N Small Float Fund - Series O are as follows:

| Fund                  | Ordinary Earnings<br>(US\$) | Net Capital Gains<br>(US\$) | Cash/Property<br>Distributions (US\$) |
|-----------------------|-----------------------------|-----------------------------|---------------------------------------|
| PH&N Small Float Fund | 0.0010109283                | 0.0019933521                | 0.3851140090                          |

(3) Each of the funds named above will, upon receipt of request, permit the U.S. unitholder to inspect and copy its permanent books of account, records, and other such documents as may be maintained by such funds to establish their respective ordinary earnings and net capital gains under U.S. income tax principles, and to verify these amounts and the pro-rata shares thereof.

Signature: *Thomas C. Lee*

Title: Vice President, Taxation

Date: February 2, 2021

Customer Service: 1-800-661-6141

Dealer Services: 1-800-662-0652

® / TM Trademark(s) of Royal Bank of Canada. Used under licence. © RBC Global Asset Management Inc. 2020