

Emerald Plantation Holdings Limited

May 8, 2014

Attention: U.S. Shareholder

Re: 2013 PFIC status

This statement is provided for shareholders who are United States persons for purposes of the U.S. Internal Revenue Code

This statement applies to the taxable year of Emerald Plantation Holdings Limited (the "Company"), on a combined basis with its subsidiaries, beginning on December 14, 2012 and ending on December 31, 2013 (the "Taxable Period"). With respect to the Taxable Period, the Company, on a combined basis with its subsidiaries, believes it should not be deemed a passive foreign investment company ("PFIC"). If, however, it were deemed a PFIC, certain U.S. income tax consequences would flow from such a designation. These consequences may be mitigated by making a protective election to treat the Company as a Qualified Electing Fund ("QEF"). The enclosed PFIC Annual Information Statement contains information to enable you or your tax advisor to make a protective QEF election.

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

A U.S. shareholder is permitted to make a retroactive QEF election in particular circumstances, including if the U.S. shareholder had a reasonable belief that the Company was not a PFIC and filed a protective election.

WE STRONGLY URGE U.S. SHAREHOLDERS TO CONSULT WITH THEIR OWN TAX ADVISORS REGARDING ANY DECISION TO MAKE (OR REFRAIN FROM MAKING) ANY ELECTION THAT MAY BE AVAILABLE TO THEM, INCLUDING A PROTECTIVE QEF ELECTION. ANY SUCH DECISION WILL DEPEND UPON INDIVIDUAL TAX CIRCUMSTANCES AND MAY HAVE SIGNIFICANT AND CONTINUING U.S. TAX CONSEQUENCES.

THE COMPANY IS UNABLE TO GIVE ADVICE IN THIS REGARD.

Further information on PFIC rules, including Form 8621 and Instructions for Form 8621, is available on the Internal Revenue Service's website: www.irs.gov

**PFIC ANNUAL INFORMATION STATEMENT – Combined Basis
FOR EMERALD PLANTATION HOLDINGS LIMITED**

(1) This information applies to the taxable year of Emerald Plantation Holdings Limited (the "**Company**"), on a combined basis with its subsidiaries, beginning on December 14, 2012 and ending on December 31, 2013 (the "Taxable Period").¹

(2) The total ordinary earnings and net capital gains of the Company on a combined basis with its subsidiaries for the Taxable Period specified in paragraph (1) are:²

a. Ordinary Earnings: NONE

b. Net Capital Gain: NONE

c. Your pro rata share of the Company's ordinary earnings is: NONE

d. Your pro rata share of the Company's net capital gain is: NONE

e. The amount of cash and the fair market value of other property distributed or deemed distributed to you during the taxable year specified in paragraph (1) is: NONE

(3) To the extent necessary, the Company will permit any of its U.S. shareholders to inspect and copy its permanent books of account, records, and such other documents as may be maintained by the Company that are necessary to establish that the Company's ordinary earnings and net capital gain are computed in accordance with U.S. income tax principles, and to verify these amounts and your pro rata shares thereof.

Emerald Plantation Holdings Limited

Date: MAY 8, 2014

By:



THIS INFORMATION STATEMENT IS PROVIDED IN ORDER TO ASSIST THOSE U.S. SHAREHOLDERS WHO WILL MAKE A QEF ELECTION OR PROTECTIVE QEF ELECTION WITH RESPECT TO EMERALD PLANTATION HOLDINGS LIMITED AND DOES NOT CONSTITUTE TAX ADVICE. U.S. SHAREHOLDERS ARE ADVISED TO CONSULT THEIR OWN TAX ADVISORS CONCERNING THE OVERALL TAX CONSEQUENCES OF THE OWNERSHIP OF EMERALD PLANTATION HOLDINGS LIMITED ARISING IN THEIR OWN PARTICULAR SITUATIONS UNDER UNITED STATES FEDERAL, STATE OR LOCAL LAW OR ANY FOREIGN LAW.

¹ If you require a list of all PFIC subsidiaries, please contact us.

² Section 2 herein reflects net losses with respect to the Company for the Taxable Period.