

PFIC Annual Information Statement

- (1) This Information Statement applies to the taxable year of Banro Congo Mining S.A.R.L. (the "Company") beginning on January 1, 2011 and ending on December 31, 2011.
- (2) Each shareholder of the Company has the following pro-rata share of the ordinary earnings and net capital gain of the Company for the taxable year of the Company specified in paragraph (1):

Ordinary Earnings: \_\_\_\_\_ \$nil

Net Capital Gain: \_\_\_\_\_ \$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 specified in paragraph (1) 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.

BANRO CONGO MINING S.A.R.L.

By: \_\_\_\_\_ A.T. Kondrat

Date: \_\_\_\_\_ March 28, 2011

Title: \_\_\_\_\_ Director