

April 25, 2022

Attention: U.S. Shareholders of Anthemis Digital Acquisitions I Corp

## IMPORTANT TAX NOTICE

Re: 2021 PFIC Status

This statement is provided for shareholders who are United States persons for purposes of the U.S. Internal Revenue Code. It is not relevant to other shareholders.

Anthemis Digital Acquisitions I Corp (or "the Company") meets the Internal Revenue Code definition of a passive foreign investment company ("PFIC") for the taxable year ended December 31, 2021. The Company is hereby making available PFIC Annual Information Statements for Anthemis Digital Acquisitions I Corp for their taxable years beginning on February 6, 2021 and ending on December 31, 2021 pursuant to the requirements of Treasury Regulation Section 1.1295-1(g)(1).

The PFIC Annual Information Statements contain information to enable you, should you choose, to elect to treat Anthemis Digital Acquisitions I Corp as a Qualified Electing Fund ("QEF").

A U.S. shareholder who makes a QEF election for Anthemis Digital Acquisitions I Corp is required annually to include in his or her income or his or her pro rata share of the ordinary earnings and net capital gains for Anthemis Digital Acquisitions I Corp The QEF election is made by completing and attaching Form 8621 for each PFIC to your federal income tax return filed by the due date of the return, including extensions.

U.S. shareholders are advised to consult with their tax advisors with respect to the 2021 PFIC Annual Information Statement.

Further information on PFIC rules is available on the internet at the Internal Revenue Service website, including the following pages:

Detailed information about PFICs and the QEF election: <a href="https://www.irs.gov/instructions/i8621">https://www.irs.gov/instructions/i8621</a>

Instructions to complete Form 8621: <a href="https://www.irs.gov/pub/irs-pdf/i8621.pdf">https://www.irs.gov/pub/irs-pdf/i8621.pdf</a>

Form 8621: https://www.irs.gov/pub/irs-pdf/f8621.pdf

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





## **PFIC Annual Information Statement**

## **Anthemis Digital Acquisitions I Corp**

- 1) This Information Statement applies to the taxable year of Anthemis Digital Acquisitions I Corp beginning on February 26, 2021 and ending on December 31, 2021 (the "Taxable Year").
- 2) Your pro rata share of Anthemis Digital Acquisitions I Corp's ordinary earnings for the Taxable Year can be determined as follows:
  - i) If you owned Anthemis Digital Acquisitions I Corp's shares for the 61 day IPO period from November 1, 2021 through December 31, 2021, you should multiply the number of shares by the "Ordinary Income Per Share" amount below.

	Total Ordinary	Ordinary Income Per Share
	Income	
Class B Ordinary Shares	US\$ 0.00	US\$ 0.000000
Class A Ordinary Shares	US\$ 3,195.00	US\$ 0.000139

ii) If you did not own all of your Anthemis Digital Acquisitions I Corp shares for the 61 day IPO period, your daily pro rata share of Anthemis Digital Acquisitions I Corp's ordinary earnings is:

	Daily Ordinary Income Pro Rata Share
Class B Ordinary Shares (November 01, 2021 – December 31, 2021)	US\$ 0.000000
Class A Ordinary Public Shares (November 01, 2021 – December 31, 2021)	US\$ 0.000002

U.S. shareholders are advised to consult with their tax advisors with respect to the calculation of their pro rata share of Anthemis Digital Acquisitions I Corp's ordinary earnings and net short term and long term capital gain for the Taxable Year.

3) The amount of cash and the fair market value of other property distributed or deemed distributed by Anthemis Digital Acquisitions I Corp during the Taxable Year are as follows:

Cash: US \$0.00 Fair Market Value of Property: US \$0.00

- 4) The Summary of Annual Information of Anthemis Digital Acquisitions I Corp is as follows:
  - a) Description of each class of shares Class A and B Ordinary Shares
  - b) Total number of shares outstanding at year-end:



i) Class B Ordinary Shares: <u>7,187,500</u> and

ii) Class A Ordinary Shares: 23,000,000

- c) Total FMV of Class A Ordinary Shares at December 31, 2021 US\$ 9.85 per share.
- 5) Any shareholders making a QEF election will be permitted by Anthemis Digital Acquisitions I Corp to inspect and copy its permanent books of account, records, and such other documents as are maintained by Anthemis Digital Acquisitions I Corp that are necessary to establish that Anthemis Digital Acquisitions I Corp's ordinary earnings and net capital gain, as provided in section 1293(e) of the U.S. Internal Revenue Code, are computed in accordance with U.S. income tax principles, and to verify these amounts and your pro rata share thereof.

Anthemis Digital Acquisitions I Corp

		DocuSigned by:
29 April 2022	Bv:	Mei Lim
Date:		7E536ED46F8C4BD
		Authorized Representative