



January 27, 2025

**IMPORTANT TAX NOTICE TO U.S. SHAREHOLDERS RELATED TO YOUR INVESTMENT IN
TRILOGY METALS INC.**

Re: Fiscal 2024 PFIC status

This statement is provided for shareholders of Trilogy Metals Inc who are subject to U.S. federal income tax. It is not relevant to other shareholders.

Trilogy Metals Inc. (“Trilogy”) may be considered a passive foreign investment company (“PFIC”) under Section 1297 of the United States Internal Revenue Code (the “Code”) for the taxable period beginning on December 1, 2023 and ending on November 30, 2024. For shareholders of Trilogy that are subject to U.S. federal income tax (“U.S. Shareholders”), certain significant and potentially adverse United States federal income tax consequences may result from these designations. Such consequences may generally be mitigated by making a timely and effective election to treat Trilogy as a Qualified Electing Fund under Section 1295 of the Code (“QEF Election”).

Pursuant to the requirements of Treasury Regulation Section 1.1295-1(g)(1), the attached PFIC Annual Information Statement is being provided to US Shareholders who have made or intend to make a QEF Election. The attached PFIC Annual Information Statement contains information to enable you or your tax advisor to prepare your tax return if you make the QEF Election.

A U.S. Shareholder 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 gains of Trilogy. A QEF Election is made by completing and attaching Form 8621 to your federal income tax return filed by the due date of the return.

THIS INFORMATION IS PROVIDED IN ORDER TO ASSIST U.S. SHAREHOLDERS IN MAKING CALCULATIONS AND DOES NOT CONSTITUTE TAX ADVICE. WE STRONGLY URGE U.S. SHAREHOLDERS TO CONSULT WITH THEIR OWN TAX ADVISOR TO DETERMINE WHETHER THEY ARE SUBJECT TO U.S. FEDERAL INCOME TAX, AND IF SO, WHETHER THEY ARE ELIGIBLE TO MAKE ANY APPLICABLE ELECTIONS PERTAINING TO TRILOGY’S STATUS AS A PFIC. ANY DECISION TO MAKE (OR REFRAIN FROM MAKING) ANY ELECTION THAT MAY BE AVAILABLE TO THEM WILL DEPEND UPON THEIR OWN PARTICULAR TAX SITUATION AND MAY HAVE SIGNIFICANT AND CONTINUING US TAX CONSEQUENCES. TRILOGY IS UNABLE TO GIVE ADVICE IN THIS REGARD.

Trilogy Metals Inc. PFIC Annual Information Statement

(1) This Information Statement applies to the taxable period of Trilogy Metals Inc. (“Trilogy”) beginning on December 1, 2023 and ending on November 30, 2024.

(2) Each person who owned or was treated under U.S. Internal Revenue Code Section 1298(a) as owning common shares of Trilogy during the year ended November 30, 2024, a “Shareholder”, has the following pro-rata share of ordinary earnings and net capital gain of Trilogy for the taxable year end specified in paragraph (1) above:

Ordinary Earnings:	None
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Net Capital Gain:	None
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(3) The amount of cash and fair market value of other property distributed or deemed distributed by Trilogy to each Shareholder during the taxable year specified in paragraph (1) is as follows:

Ordinary Earnings:	None
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Net Capital Gain:	None
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(4) Trilogy will permit each Shareholder to inspect the permanent books of account, records, and such other documents as may be maintained by that are necessary to establish that Trilogy’s ordinary earnings and net capital gain are computed in accordance with U.S. income tax principles, and to verify these amounts and the Shareholder’s pro-rata share thereof.

TRIOLOGY METALS INC.

Signed: /s/ “Elaine Sanders”

By: Elaine Sanders

Title: Chief Financial Officer

Date: January 27, 2025