

April 6, 2021

Attention: U.S. Shareholders of Sustainable Opportunities Acquisition Corp.

## **IMPORTANT TAX NOTICE**

Re: 2020 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.**

Sustainable Opportunities Acquisition Corp. (or “the Company”) meets the Internal Revenue Code definition of a passive foreign investment company (“PFIC”) for the taxable year ended December 31, 2020. The Company is hereby making available PFIC Annual Information Statements for Sustainable Opportunities Acquisition Corp. for their taxable years beginning on January 1, 2020 and ending on December 31, 2020 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 Sustainable Opportunities Acquisition Corp. as a Qualified Electing Fund (“QEF”).

A U.S. shareholder who makes a QEF election for Sustainable Opportunities Acquisition 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 Sustainable Opportunities Acquisition 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 2020 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: <https://www.irs.gov/instructions/i8621>

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

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 SUSTAINABLE OPPORTUNITIES ACQUISITION CORP. ARISING IN THEIR OWN PARTICULAR SITUATIONS UNDER THE UNITED STATES FEDERAL, STATE, LOCAL OR FOREIGN LAW.**

**PFIC Annual Information Statement**  
**Sustainable Opportunities Acquisition Corp.**

- 1) This Information Statement applies to the taxable year of Sustainable Opportunities Acquisition Corp. beginning on January 1, 2020 and ending on December 31, 2020 (the “Taxable Year”).
- 2) Your pro rata share of Sustainable Opportunities Acquisition Corp.’s ordinary earnings for the Taxable Year can be determined as follows:
  - i) If you owned Sustainable Opportunities Acquisition Corp.’s shares for the entire IPO period from May 8, 2020 through December 31, 2020, you should multiply the number of shares by the “Ordinary Income Per Share” amount below.

	Total Ordinary Income	Ordinary Income Per Share
Class B Founder Shares	US\$ 0.00	US\$ 0.000000
Class A Ordinary Shares	US\$ 69,247	US\$ 0.002308
Private Placement Warrants	US\$ 0.00	US\$ 0.000000

- ii) If you did not own all of your Sustainable Opportunities Acquisition Corp. shares for the entire 237 day IPO period, your daily pro rata share of Sustainable Opportunities Acquisition Corp.’s ordinary earnings is:

	Daily Ordinary Income Pro Rata Share
Class B Founder Shares (January 1, 2020 – December 31, 2020)	US\$ 0.000000
Class A Ordinary Shares (May 8 – December 31, 2020)	US\$ 0.000010
Private Placement Warrants (May 8 – December 31, 2020)	US\$ 0.000000

U.S. shareholders are advised to consult with their tax advisors with respect to the calculation of their pro rata share of Sustainable Opportunities Acquisition 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 Sustainable Opportunities Acquisition 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 Sustainable Opportunities Acquisition Corp. is as follows:

a) Description of each class of shares – **Ordinary share.**

b) Total number of shares outstanding at year-end:

i) Class B Founder Shares: **7,500,000.**

ii) Class A Ordinary Shares: **30,000,000** and

iii) Private Placement Warrants: **9,500,000.**

c) Total FMV of IPO shares at December 31, 2020 – **US\$ 10.76 per share.**

- 5) Any shareholders making a QEF election will be permitted by Sustainable Opportunities Acquisition Corp. to inspect and copy its permanent books of account, records, and such other documents as are maintained by Sustainable Opportunities Acquisition Corp. that are necessary to establish that Sustainable Opportunities Acquisition 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.

Sustainable Opportunities Acquisition Corp.

Date: April 6, 2021

By: /s/ David Quiram  
Authorized Representative