



PFIC Annual Information Statement

PFIC Information

IMPORTANT TAX NOTICE TO U.S. SHAREHOLDERS OF COMPASS PATHWAYS PLC ORDINARY SHARES/ADSS

This statement is provided for the benefit of shareholders who are United States persons for purposes of the U.S. Internal Revenue Code of 1986, as amended ("Code") and the Treasury Regulations thereunder. United States persons include U.S. citizens (whether or not they are U.S. residents), certain individuals with U.S. permanent resident status, U.S. corporations, U.S. partnerships and certain U.S. trusts and estates. Investors in Compass Pathways should consult with their own U.S. tax professionals to determine whether they are United States persons.

Compass Pathways plc ("Compass Pathways") believes the company should be classified as a Passive Foreign Investment Company ("PFIC") as defined in Code Section 1297(a) for its U.S. tax year ended December 31, 2023.

This PFIC Annual Information Statement is being provided pursuant to the requirements of Treasury Regulation Section 1.1295-1(g)(1). The PFIC Annual Information Statement contains information to enable you, should you so choose based on the advice of your own tax advisors, to elect to treat Compass Pathways as a qualified electing fund ("QEF") for its U.S. tax year ended December 31, 2023. Investors are generally required to report QEF elections for PFICs having tax years that end during or on the same date as their own U.S. tax year-end. Once a QEF election is made, the election is generally effective for the election year and all subsequent taxable years of a U.S. shareholder unless invalidated, terminated or revoked in accordance with the Treasury Regulations.

A U.S. shareholder who makes a QEF election is required to include in their annual income their pro-rata share of the ordinary earnings (which includes all dividend and interest income) and net capital gain of Compass Pathways, whether or not any amounts were distributed to the shareholders.

WE RECOMMEND U.S. SHAREHOLDERS CONSULT WITH THEIR TAX ADVISORS REGARDING ANY DECISION TO MAKE (OR REFRAIN FROM MAKING) ANY ELECTION THAT MAY BE AVAILABLE TO THEM BECAUSE ANY SUCH DECISION WILL DEPEND UPON THEIR OWN PARTICULAR TAX SITUATION AND MAY HAVE SIGNIFICANT AND CONTINUING U.S. TAX CONSEQUENCES. THE COMPANY IS UNABLE TO GIVE ADVICE IN THIS REGARD.

The QEF election is made on Form 8621 ("Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund") filed on or before the due date, including extensions, for the income tax return of the U.S. shareholder with respect to the first tax year to which the election relates. Shareholders who are United States persons are required to report their holdings of the PFIC on Form 8621 whether or not they make the QEF election. The below information is designed to enable a shareholder to make a QEF election for Compass Pathways and to calculate their reportable income for the year 2023.

- (1) Compass Pathways incurred a loss in 2023, however losses are not allowed to be deducted.

- (2) The pro-rata per-share, per-day allocation of ordinary income earned by each shareholder of Compass Pathways for the U.S. tax year ending December 31, 2023, is equal to \$0.000000 per share, per day.
- (3) The pro-rata per-share, per day allocation of capital gain earned by each shareholder of Compass Pathways for the U.S. tax year ending December 31, 2023, is equal to \$0.000000 per share, per day.
- (4) Cash or property distributed or deemed to be distributed during the U.S. tax year ending December 31, 2023, is \$0.
- (5) Compass Pathways will, upon receipt of request, permit the U.S. shareholder to inspect and copy Compass Pathways' permanent books of account, records, and other such documents as may be maintained by Compass Pathways to establish its respective ordinary earnings and net capital gains under U.S. income tax principles, and to verify these amounts and the pro-rata shares thereof.

Compass Pathways plc

By: /s/ Teri Loxam

Title: Chief Financial Officer

Date: August 27, 2024

THIS INFORMATION IS PROVIDED IN ORDER TO ASSIST THOSE SHAREHOLDERS WHO HAVE MADE A QEF ELECTION WITH RESPECT TO COMPASS PATHWAYS PLC IN MAKING CERTAIN PFIC CALCULATIONS AND DOES NOT CONSTITUTE TAX ADVICE. THOSE SHAREHOLDERS ARE ADVISED TO CONSULT THEIR OWN TAX ADVISORS CONCERNING THE OVERALL TAX CONSEQUENCES OF THE OWNERSHIP OF SHARES ARISING IN THEIR OWN PARTICULAR SITUATIONS UNDER UNITED STATES FEDERAL, STATE, LOCAL AND FOREIGN LAW.