



IMPORTANT TAX NOTICE RE: 2021 PFIC Status

Orion Biotech Opportunities Corp. should be deemed to be classified as a passive foreign investment company (PFIC), as defined in Section 1297(a) of the Internal Revenue Code, for the tax year ended December 31, 2021. Orion Biotech Opportunities Corp. is hereby making available its PFIC Annual Information Statement for the tax year ended December 31, 2021, pursuant to Treasury Regulations Section 1.1295-1(g)(1).

This information is provided to assist Orion Biotech Opportunities Corp. shareholders in making calculations and does not constitute tax advice. The U.S. tax laws regarding PFICs are extremely complex, and shareholders are advised to consult their own tax advisor concerning the overall tax consequences of their respective investment in an indirect ownership of a respective class of shares of Orion Biotech Opportunities Corp. under U.S. federal, state, local and foreign law.

Further information on the PFIC rules is available on the internet at the Internal Revenue Service website.

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PFIC Annual Information Statement

This Information Statement relates to the tax year beginning February 5, 2021 (inception) and ending December 31, 2021.

The amounts of ordinary income and net capital gains are reflected below. In addition, the amount of cash and the fair market value of other property distributed or deemed distributed by Orion Biotech Opportunities Corp. during the taxable year are as follows:

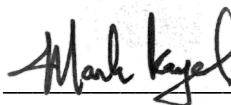
Particulars	Amount (USD)
Cash Distributions	0
Fair Market Value of Property Distributed	0
Ordinary Income	0
Net Capital Gains	0

Orion Biotech Opportunities Corp. will permit its shareholders to inspect and copy the permanent books of account, records and such other documents as may be maintained by Orion Biotech Opportunities Corp. that are necessary to establish the Orion Biotech Opportunities Corp. 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.

Note that the amounts noted above are reflected at the Orion Biotech Opportunities Corp. level (at 100%). Each shareholder will need to calculate their applicable portion of income based on their ownership in the Orion Biotech Opportunities Corp.

Orion Biotech Opportunities Corp.

Date: 04/04/22

By: 

Title: CFO