



March 15, 2018

This statement is provided for shareholders of Golden Queen Mining Ltd. who are United States persons for purposes of the U.S. Internal Revenue Code of 1986, as amended ("IRC") and the regulations thereunder and are required to file a United States Federal Income Tax Returns. It is not relevant to other shareholders.

Golden Queen Mining Ltd. ("Golden Queen") believes that on a more likely than not basis that it should not be considered a passive foreign investment company ("PFIC") under §1297(a) of the United States Internal Revenue Code (the "Code") for the taxable year ended December 31, 2017. The determination as to whether any corporation was, or will be, a PFIC for a particular year end depends, in part on the application of complex U.S. federal income tax statutes, regulations and the interpretation thereof. In addition, whether any corporation will be a PFIC for any tax year depends on its assets and income over the course of such tax year and as a result, the PFIC status of Golden Queen for 2017 and any future tax year is subject to a complex analysis and therefore cannot be predicated with certainty. For shareholders of Golden Queen that are subject to U.S. federal income tax ("U.S. Shareholders"), certain significant and potentially adverse United States federal income tax consequences result from this designation.

THIS INFORMATION IS PROVIDED IN ORDER TO ASSIST U.S. SHAREHOLDERS AND IN MAKING CALCULATIONS AND DOES NOT CONSTITUTE TAX ADVICE. WE STRONGLY URGE U.S. SHAREHOLDERS TO CONSULT WITH THEIR OWN TAX ADVISOR.

For further information on PFIC, please see the rules that are available from the Internal Revenue Service at www.irs.gov