

PFIC Annual Information Statement: Forward Pharma A/S

IMPORTANT TAX NOTICE TO SHAREHOLDERS WHO ARE UNITED STATES PERSONS

We believe that Forward Pharma A/S (the "Company"), Forward Pharma FA ApS, Forward Pharma Operations ApS, FWP IP ApS, and Forward Pharma GmbH, (collectively, the "Group") meet the definition of "Passive Foreign Investment Corporations" ("PFICs") for the taxable year beginning January 1, 2017 and ending on December 31, 2017.

The attached PFIC Annual Information Statements are being provided for shareholders who are United States persons 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 tax advisors in light of your tax circumstances, to elect to treat the Company as a Qualified Electing Fund ("QEF").

A United States person who makes a QEF election generally 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 the Company for years in which the Company is a PFIC, whether or not the Company distributes any amounts to its shareholders. If you do not elect to treat the Company as a QEF, then if the Company is a PFIC for any year during your holding period, adverse tax consequences could result. In addition, in a multi-tiered PFIC structure, the PFIC Annual Information Statement must also include the amount of cash and the fair market value of other properties distributed or deemed distributed to the shareholders during the taxable year of the PFICs pursuant to Section 1.1295-1(g)(3).

The shareholder's QEF election is generally made on Form 8621 ("Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund") attached to the shareholder's federal income tax return that is filed on or before the due date of the return, including extensions. There are also other reporting options available on Form 8621, such as the mark-to-market election under Section 1296 of the Internal Revenue Code of 1986, as amended. Because the stock of the Company is traded on the Nasdaq stock exchange, and should be regularly traded thereon, we believe stock of the Company should be treated as "marketable stock," which would generally enable a shareholder to make this election. A shareholder who makes this election generally is required to annually include in ordinary income the excess amount (if any) of the fair market value of the stock as of the close of the taxable year over the shareholder's adjusted basis in such stock. If instead the shareholder's adjusted basis in such stock exceeds such fair market value, then in some cases that excess

may be available as a deduction against other income. A mark-to-market election, or a QEF election, generally is effective for not only the taxable year of the annual federal income tax return to which the Form 8621 on which the election is made is attached, but for subsequent years as well. Shareholders should consult with their tax advisers to determine whether a QEF election or a mark-to-market election should be made.

THE INFORMATION INCLUDED IN THIS LETTER AND IN THE PFIC STATEMENT ATTACHED DOES NOT CONSTITUTE TAX ADVICE. THE U.S. TAX LAWS REGARDING PFICS ARE EXTREMELY COMPLEX AND SHAREHOLDERS ARE ADVISED TO CONSULT WITH THEIR OWN TAX ADVISORS CONCERNING THE OVERALL TAX CONSEQUENCES OF THE OWNERSHIP OF UNITS ARISING IN THEIR OWN PARTICULAR SITUATIONS UNDER UNITED STATES FEDERAL, STATE, LOCAL OR FOREIGN LAW AS WELL AS TO DETERMINE APPROPRIATE REPORTING OBLIGATIONS.

PFIC Annual Information Statement

This information statement applies to Forward Pharma A/S, a foreign corporation organized under the laws of Denmark. Forward Pharma A/S believes that it is a Passive Foreign Investment Company (“PFIC”) for the tax period ending December 31, 2017 for U.S. tax purposes. If an election has been made to treat this PFIC as a Qualified Electing Fund (“QEF”) by filing Form 8621, the following information is relevant.

Note: During the calendar year of 2017, there were multiple events that effected the number of outstanding ordinary shares. The events included the issuance of shares in connection with the exercise of warrants on March 29, 2017, the 10 for 1 share split that was effective on August 2, 2017 and the share annulment that took place on September 1, 2017. The tables below summarize the daily earnings per one share for the period noted. Holders of our ADSs experienced an increase in shares held by a multiple of 10 on August 2, 2017 and a decrease in shares held by a multiple of 8 on September 1, 2017.

1. The taxable year of Forward Pharma A/S began on January 1, 2017 and ended on December 31, 2017 (the “Taxable Year”).
2. Outstanding number of ordinary shares on December 31, 2017:

Beginning of Period	End of Period	Shares During Period	Each ADS Represented the Following Shares
January 1, 2017	March 29, 2017	47,143,889	1
March 29, 2017	August 2, 2017	47,183,999	1
August 2, 2017	September 1, 2017	471,839,990	10
September 1, 2017	December 31, 2017	94,367,998	2

3. During the Taxable Year, the Company’s per-share, per-day ordinary earnings and net capital gain were:

Beginning of Period	End of Period	Days	Ordinary Earnings Per Share Per Day During Period
January 1, 2017	March 29, 2017	87	US \$0.0539
March 29, 2017	August 2, 2017	126	US \$0.0539
August 2, 2017	September 1, 2017	30	US \$0.0054
September 1, 2017	December 31, 2017	122	US \$0.0269

- Cash and fair market value of other property distributed or deemed distributed per-share (based on 471,839,990 outstanding as of that date) on September 1, 2017 by the Company for the Taxable Year:

Cash Distributions	US \$2.3184
Property Distributions	US \$0.0000

The Company will permit shareholders who are United States persons to inspect and copy its permanent books of account, records, and such other documents as may be maintained by the Company that are necessary to establish that the Company's ordinary earnings and net capital gain, as defined in Section 1293(e) of the Internal Revenue Code of 1986, as amended, are computed in accordance with U.S. income tax principles; and to verify these amounts and the shareholder's pro rata share thereof.

PFIC Annual Intermediary Statement

This information statement applies to Forward Pharma FA ApS, a foreign corporation organized under the laws of Denmark. Forward Pharma FA ApS believes that it is a Passive Foreign Investment Company (“PFIC”) for the tax period ending December 31, 2017 for U.S. tax purposes. If an election has been made to treat this PFIC as a Qualified Electing Fund (“QEF”) by filing Form 8621, the following information is relevant.

Please refer to Forward Pharma A/S PFIC Annual Information Statement for further discussion on the overall share activity for 2017.

1. The taxable year of Forward Pharma FA ApS began on January 1, 2017 and ended on December 31, 2017 (the “Taxable Year”).
2. Outstanding number of ordinary shares on December 31, 2017:

Beginning of Period	End of Period	Shares During Period
January 1, 2017	March 29, 2017	47,143,889
March 29, 2017	August 2, 2017	47,183,999
August 2, 2017	September 1, 2017	471,839,990
September 1, 2017	December 31, 2017	94,367,998

3. During the Taxable Year, the Company’s per-share, per-day ordinary earnings and net capital gain were:

Beginning of Period	End of Period	Days	Ordinary Earnings Per Share Per Day During Period
January 1, 2017	March 29, 2017	87	US \$0.0000
March 29, 2017	August 2, 2017	126	US \$0.0000
August 2, 2017	September 1, 2017	30	US \$0.0000
September 1, 2017	December 31, 2017	122	US \$0.0000

- Cash and fair market value of other property distributed or deemed distributed per-share, per-day by the Company for the Taxable Year:

Cash Distributions	US \$0.0000
Property Distributions	US \$0.0000

The Company will permit shareholders who are United States persons to inspect and copy its permanent books of account, records, and such other documents as may be maintained by the Company that are necessary to establish that the Company's ordinary earnings and net capital gain, as defined in Section 1293(e) of the Internal Revenue Code of 1986, as amended, are computed in accordance with U.S. income tax principles; and to verify these amounts and the shareholder's pro rata share thereof.

PFIC Annual Intermediary Statement

This information statement applies to Forward Pharma Operations ApS, a foreign corporation organized under the laws of Denmark. Forward Pharma Operations ApS believes that it is a Passive Foreign Investment Company (“PFIC”) for the tax period ending December 31, 2017 for U.S. tax purposes. If an election has been made to treat this PFIC as a Qualified Electing Fund (“QEF”) by filing Form 8621, the following information is relevant.

Please refer to Forward Pharma A/S PFIC Annual Information Statement for further discussion on the overall share activity for 2017.

1. The taxable year of Forward Pharma Operations ApS began on June 30, 2017 and ended on December 31, 2017 (the “Taxable Year”).
2. Outstanding number of ordinary shares on December 31, 2017:

Beginning of Period	End of Period	Shares During Period
January 1, 2017	June 30, 2017	0
June 30, 2017	August 2, 2017	47,183,999
August 2, 2017	September 1, 2017	471,839,990
September 1, 2017	December 31, 2017	94,367,998

3. During the Taxable Year, the Company’s per-share, per-day ordinary earnings and net capital gain were:

Beginning of Period	End of Period	Days	Ordinary Earnings Per Share Per Day During Period
January 1, 2017	June 30, 2017	180	US \$0.0000
June 30, 2017	August 2, 2017	33	US \$0.0000
August 2, 2017	September 1, 2017	30	US \$0.0000
September 1, 2017	December 31, 2017	122	US \$0.0000

- Cash and fair market value of other property distributed or deemed distributed per-share, per-day by the Company for the Taxable Year:

Cash Distributions	US \$0.0000
Property Distributions	US \$0.0000

The Company will permit shareholders who are United States persons to inspect and copy its permanent books of account, records, and such other documents as may be maintained by the Company that are necessary to establish that the Company's ordinary earnings and net capital gain, as defined in Section 1293(e) of the Internal Revenue Code of 1986, as amended, are computed in accordance with U.S. income tax principles; and to verify these amounts and the shareholder's pro rata share thereof.

PFIC Annual Intermediary Statement

This information statement applies to FWP IP ApS, a foreign corporation organized under the laws of Denmark. FWP IP ApS believes that it is a Passive Foreign Investment Company (“PFIC”) for the tax period ending December 31, 2017 for U.S. tax purposes. If an election has been made to treat this PFIC as a Qualified Electing Fund (“QEF”) by filing Form 8621, the following information is relevant.

Please refer to Forward Pharma A/S PFIC Annual Information Statement for further discussion on the overall share activity for 2017.

1. The taxable year of FWP IP ApS began on June 30, 2017 and ended on November 22, 2017 (the “Taxable Year”).
2. Outstanding number of ordinary shares on November 22, 2017:

Beginning of Period	End of Period	Shares During Period
January 1, 2017	June 30, 2017	0
June 30, 2017	August 2, 2017	47,183,999
August 2, 2017	September 1, 2017	471,839,990
September 1, 2017	November 22, 2017	94,367,998

3. During the Taxable Year, the Company’s per-share, per-day ordinary earnings and net capital gain were:

Beginning of Period	End of Period	Days	Ordinary Earnings Per Share Per Day During Period
January 1, 2017	June 30, 2017	180	US \$0.0000
June 30, 2017	August 2, 2017	33	US \$0.0000
August 2, 2017	September 1, 2017	30	US \$0.0000
September 1, 2017	November 22, 2017	83	US \$0.0000

- Cash and fair market value of other property distributed or deemed distributed per-share, per-day by the Company for the Taxable Year:

Cash Distributions	US \$0.0000
Property Distributions	US \$0.0000

The Company will permit shareholders who are United States persons to inspect and copy its permanent books of account, records, and such other documents as may be maintained by the Company that are necessary to establish that the Company's ordinary earnings and net capital gain, as defined in Section 1293(e) of the Internal Revenue Code of 1986, as amended, are computed in accordance with U.S. income tax principles; and to verify these amounts and the shareholder's pro rata share thereof.

PFIC Annual Intermediary Statement

This information statement applies to Forward Pharma GmbH, a foreign corporation organized under the laws of Germany. Forward Pharma GmbH believes that it is a Passive Foreign Investment Company (“PFIC”) for the tax period ending December 31, 2017 for U.S. tax purposes. If an election has been made to treat this PFIC as a Qualified Electing Fund (“QEF”) by filing Form 8621, the following information is relevant.

Please refer to Forward Pharma A/S PFIC Annual Information Statement for further discussion on the overall share activity for 2017.

1. The taxable year of Forward Pharma GmbH began on January 1, 2017 and ended on December 31, 2017 (the “Taxable Year”).
2. Outstanding number of ordinary shares on December 31, 2017:

Beginning of Period	End of Period	Shares During Period
January 1, 2017	March 29, 2017	47,143,889
March 29, 2017	August 2, 2017	47,183,999
August 2, 2017	September 1, 2017	471,839,990
September 1, 2017	December 31, 2017	94,367,998

3. During the Taxable Year, the Company’s per-share, per-day ordinary earnings and net capital gain were:

Beginning of Period	End of Period	Days	Ordinary Earnings Per Share Per Day During Period
January 1, 2017	March 29, 2017	87	US \$0.0027
March 29, 2017	August 2, 2017	126	US \$0.00267
August 2, 2017	September 1, 2017	30	US \$0.0003
September 1, 2017	December 31, 2017	122	US \$0.0013

- Cash and fair market value of other property distributed or deemed distributed per-share, per-day by the Company for the Taxable Year:

Cash Distributions	US \$0.0000
Property Distributions	US \$0.0000

The Company will permit shareholders who are United States persons to inspect and copy its permanent books of account, records, and such other documents as may be maintained by the Company that are necessary to establish that the Company's ordinary earnings and net capital gain, as defined in Section 1293(e) of the Internal Revenue Code of 1986, as amended, are computed in accordance with U.S. income tax principles; and to verify these amounts and the shareholder's pro rata share thereof.